

June 29, 2017

<p>1 UNITED STATES DISTRICT 2 NORTHERN DISTRICT OF GEORGIA 3 ATLANTA DIVISION 4 QUANIAH R. STEVENSON, 5 Plaintiff(s), CIVIL ACTION FILE 6 vs. NO:1:16-cv-2571-AT-LTW 7 DELTA AIR LINES, INC., 8 Defendant(s). 9 10 DEPOSITION OF 11 QUANIAH RENETRA STEVENSON 12 13 June 29, 2017 14 9:50 a.m. 15 16 2850 First Union Plaza 17 999 Peachtree Street, NE 18 Atlanta, Georgia 19 20 Mari B. Temple, RPR, CMRS 21 Certified Court Reporter #2844 22 23 24 25</p>	<p>1 INDEX TO EXAMINATIONS 2 3 EXAMINATION BY MR. STONE 4 5 6 INDEX TO EXHIBITS 7 NUMBER DESCRIPTION PAGE 8 DEFENDANT 9 Exhibit 1 Petition for Bankruptcy 19 10 Exhibit 2 Statement of Financial 20 Affairs 11 Exhibit 3 Interrogatory Responses 23 12 Exhibit 4 Document Request 34 Responses 13 Exhibit 5 Delta Employment 67 Application 14 15 Exhibit 6 The Way We Fly at Delta 87 16 Exhibit 7 Accommodation Request 89 17 Exhibit 8 Delta Travel Pass 99 Policies 18 Exhibit 9 Topics Discussed with 108 Employee 19 20 Exhibit 10 Counseling and Discipline 124 21 Exhibit 11 Counseling and Discipline 124 22 Exhibit 12 Memorandum to Delta 145 Colleagues Worldwide 23 Exhibit 13 Frequently Asked 146 Questions 24 25</p>
<p>1 APPEARANCES OF COUNSEL: 2 In Propria Persona: 3 QUANIAH R. STEVENSON 4 1744 Cambridge Avenue 5 Atlanta, Georgia 30337 6 7 On Behalf of the Defendant(s): 8 BENJAMIN A. STONE, ESQUIRE 9 Munger & Stone,, LLP 10 2850 First Union Plaza 11 999 Peachtree Street, NE 12 Atlanta, Georgia 30309 13 (404) 815-1884 14 ben.stone@mungerandstone.com 15 16 Also Present: 17 Sheandra Clark 18 19 20 21 22 23 24 25</p>	<p>1 Exhibit 14 Written Statement 185 2 Exhibit 15 E-mail 185 3 Exhibit 16 Social Media 195 Communications 4 5 Exhibit 17 E-mail 203 6 Exhibit 18 Medical Record 213 7 Exhibit 19 Medical Record 215 8 Exhibit 20 Medical Record 217 9 Exhibit 21 Appeal Log 229 10 Exhibit 22 EEOC Charge 238 11 Exhibit 23 Right to Sue Letter 239 12 13 (Original Exhibits 1 through 23 were attached to the 14 original transcript.) 15 16 17 18 19 20 21 22 23 24 25</p>

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<p style="text-align: right;">Page 5</p> <p>1 Deposition of QUANIAH RENETRA STEVENSON</p> <p>2 June 29, 2017</p> <p>3</p> <p>4 QUANIAH RENETRA STEVENSON,</p> <p>5 being first duly sworn, was examined and testified</p> <p>6 as follows:</p> <p>7 EXAMINATION</p> <p>8 BY MR. STONE:</p> <p>9 Q There is no judge here, obviously.</p> <p>10 Ms. Stevenson, there's a judge, obviously, if any</p> <p>11 issues arise.</p> <p>12 Have you ever had your deposition taken</p> <p>13 before?</p> <p>14 A I never had -- never did one.</p> <p>15 Q You've never done one before.</p> <p>16 A (No response, indicating.)</p> <p>17 Q Okay. You are Quaniah Stevenson, of</p> <p>18 course; correct?</p> <p>19 A Yes.</p> <p>20 Q Do you -- have you ever been known by any</p> <p>21 other name?</p> <p>22 A Most people call me Q, QU, they just</p> <p>23 say Q. Some people say Niah. I have a kid name</p> <p>24 that I don't want to say that my family calls me.</p> <p>25 Q A nickname.</p>	<p style="text-align: right;">Page 7</p> <p>1 including criminal penalties, associated with</p> <p>2 providing false information in this deposition while</p> <p>3 you're under oath.</p> <p>4 A Uh-huh.</p> <p>5 Q Correct?</p> <p>6 A Yes, sir.</p> <p>7 Q I'm guessing you have a general idea of</p> <p>8 what's going to happen today, insofar as you know</p> <p>9 I'm going to ask you a series of questions; correct?</p> <p>10 A Yes.</p> <p>11 Q And you're going to provide me, as you've</p> <p>12 promised to do, truthful answers; correct?</p> <p>13 A Yes.</p> <p>14 Q A couple of other things that will make</p> <p>15 the day go easier today.</p> <p>16 First of all, let me, as I'm asking you a</p> <p>17 question, finish the question completely before you</p> <p>18 start to give the answer.</p> <p>19 A Okay.</p> <p>20 Q All right? That will, among other things,</p> <p>21 make life much easier for --</p> <p>22 A For Mari.</p> <p>23 Q -- our court reporter here. Yes, exactly.</p> <p>24 Second of all, if I ask you a question,</p> <p>25 please give an answer with a verbal response, a yes,</p>
<p style="text-align: right;">Page 6</p> <p>1 A Yes. But my main name is Q or Quaniah.</p> <p>2 Q Have you ever been known by any other</p> <p>3 legal name?</p> <p>4 A Oh, no.</p> <p>5 Q You've never changed your name before.</p> <p>6 A No, sir.</p> <p>7 Q Do you have a middle name?</p> <p>8 A Renetra.</p> <p>9 Q Spell that for me.</p> <p>10 A R-E-N-E-T-R-A.</p> <p>11 Q All right. You told me a moment ago</p> <p>12 you've never given a deposition before?</p> <p>13 A No. I've never -- yeah, I don't know.</p> <p>14 Q Let me give you a couple of guidelines</p> <p>15 that I think will make the day go quickly hopefully</p> <p>16 and smoothly today. All right?</p> <p>17 A Okay.</p> <p>18 Q You understand, first of all, that our</p> <p>19 court reporter just gave you an oath; correct?</p> <p>20 A Yes, yes.</p> <p>21 Q You understand that that's the same oath</p> <p>22 that you would take if you were giving testimony in</p> <p>23 federal court.</p> <p>24 A Yes, yes.</p> <p>25 Q And you understand there are penalties,</p>	<p style="text-align: right;">Page 8</p> <p>1 a no, a -- if it's necessary, a narrative response</p> <p>2 to whatever question I'm asking.</p> <p>3 A Okay.</p> <p>4 Q All right? That will also make it easier</p> <p>5 for the court reporter, because it's very hard for</p> <p>6 her to take down uh-huhs and huh-uhs.</p> <p>7 A Okay.</p> <p>8 Q All right?</p> <p>9 A Yes.</p> <p>10 Q And then the third thing, and this kind of</p> <p>11 goes with the first point I was making, do your very</p> <p>12 best not to interrupt me, and I'll do my very best</p> <p>13 not to interrupt you as you're giving the answer.</p> <p>14 A Yes, sir.</p> <p>15 Q All right. Perfect.</p> <p>16 Last point, if at any point during the</p> <p>17 course of the day, and it might happen from time to</p> <p>18 time, I ask you a question that you don't</p> <p>19 understand, you tell me that, and I will do my very</p> <p>20 best to make sure that you understand exactly what</p> <p>21 I'm asking. All right?</p> <p>22 A Yes, sir.</p> <p>23 Q All right. If you give an answer, I'm</p> <p>24 going to assume you understand my question.</p> <p>25 A Yes, sir.</p>

<p style="text-align: right;">Page 9</p> <p>1 Q So if there's any doubt in your mind, you</p> <p>2 ask me for clarification. Okay?</p> <p>3 A Yes, sir.</p> <p>4 Q All right. Ms. Stevenson, is there any</p> <p>5 reason that your memory or your ability to testify</p> <p>6 here is impaired in any way?</p> <p>7 A It's not impaired.</p> <p>8 Q All right. Is there any reason why you</p> <p>9 can't give full and complete and accurate testimony</p> <p>10 here today?</p> <p>11 A No.</p> <p>12 Q All right. Are you on any medications</p> <p>13 right now?</p> <p>14 A Not regularly.</p> <p>15 Q Have you taken any medication in the last</p> <p>16 24 hours?</p> <p>17 A No, no.</p> <p>18 Q So there's no medication that's affecting</p> <p>19 your memory or --</p> <p>20 A No.</p> <p>21 Q -- your ability to testify.</p> <p>22 When you say not regularly, tell me, are</p> <p>23 there medications that you take from time to time?</p> <p>24 A Yes, sir.</p> <p>25 Q What are those medications?</p>	<p style="text-align: right;">Page 11</p> <p>1 A No.</p> <p>2 Q All right.</p> <p>3 A No.</p> <p>4 Q And when was the last time you got a</p> <p>5 prescription for amitriptyline?</p> <p>6 A I do not know.</p> <p>7 Q So the prescription you have is at least a</p> <p>8 year or more old?</p> <p>9 A It's a little less than a year possibly.</p> <p>10 I can double-check for you.</p> <p>11 Q All right. Got it.</p> <p>12 Do you drink alcohol?</p> <p>13 A No. I do have a glass of wine</p> <p>14 occasionally, holiday time. I do not drink.</p> <p>15 Q You've not had any alcohol in the last</p> <p>16 24 hours.</p> <p>17 A No.</p> <p>18 Q Okay. Did you do anything, Ms. Stevenson,</p> <p>19 to prepare for this deposition today?</p> <p>20 A I just kind of maybe read over a few</p> <p>21 documents that you sent to me; documents that I</p> <p>22 submitted in the courts. Other than that --</p> <p>23 Q Nothing?</p> <p>24 A No, sir.</p> <p>25 Q All right.</p>
<p style="text-align: right;">Page 10</p> <p>1 A Amitriptyline.</p> <p>2 Q And what is that?</p> <p>3 A Do you want me to spell it?</p> <p>4 Q No, no, no. I want you to tell me what</p> <p>5 the medication does for you.</p> <p>6 A My mood, depression.</p> <p>7 Q All right. And how often do you take</p> <p>8 that?</p> <p>9 A Just if I'm -- I guess they call it -- if</p> <p>10 I'm having a mood swing or feeling down.</p> <p>11 Q All right. How often roughly have you</p> <p>12 taken it in the last month, if at all?</p> <p>13 A Maybe once.</p> <p>14 Q Okay. And who prescribes that to you?</p> <p>15 A Dr. Cherukupally.</p> <p>16 Q Okay.</p> <p>17 A Yeah.</p> <p>18 Q And when was the last time you saw</p> <p>19 Dr. Cherukupally?</p> <p>20 A I cannot remember.</p> <p>21 Q Has it been more than a year?</p> <p>22 A A little less than a year because she left</p> <p>23 that practice.</p> <p>24 Q Is there any other medication that you</p> <p>25 take on a regular or irregular basis?</p>	<p style="text-align: right;">Page 12</p> <p>1 A Just -- nothing at all, just --</p> <p>2 Q What specific documents did you review to</p> <p>3 get ready for the deposition? What were these few</p> <p>4 documents?</p> <p>5 A Just the things that you've mailed to me;</p> <p>6 things that I filed in the court.</p> <p>7 Q Like what? Can you give me an example?</p> <p>8 A I guess like my interrogatories maybe;</p> <p>9 some of my complaints when everything initially</p> <p>10 transpired. That's pretty much it.</p> <p>11 Q Are these -- did you look at any documents</p> <p>12 that you have -- that either I haven't given to you</p> <p>13 or you haven't given to me?</p> <p>14 A No.</p> <p>15 Q Everything that you've looked at is either</p> <p>16 material that you've sent to me or I've sent to you?</p> <p>17 A Absolutely.</p> <p>18 Q All right.</p> <p>19 A Last night.</p> <p>20 Q Okay. And how much time did you spend</p> <p>21 looking at those documents?</p> <p>22 A Probably 30 minutes.</p> <p>23 Q Do you have any of those documents with</p> <p>24 you?</p> <p>25 A No, sir.</p>

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1 Q All right. They're at your house?

2 A Yes, sir.

3 Q All right. I know that you have been a

4 party to some legal proceedings before, for example,

5 a bankruptcy; correct?

6 A Yes. Yes, sir.

7 Q Other than a bankruptcy, have you been a

8 party to any other legal proceeding? Any other

9 lawsuit, any divorce, anything like that?

10 A I've never been married.

11 Q Okay.

12 A I've been through like eviction. Is that

13 the same thing? I -- I'm just trying to make

14 sure --

15 Q Yes. That would count as a legal

16 proceeding.

17 A I've been through judgments if I owed on

18 rent.

19 Q Yeah.

20 A Traffic tickets, I don't know if that

21 applies.

22 Q Sure.

23 A Speeding.

24 Q Yep.

25 A When you say legal, are you talking

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1 arrests for anything or legal or --

2 Q I was talking about lawsuits. And

3 eviction proceedings would include that. I have not

4 asked you about arrests yet. But I will.

5 A Oh.

6 Q Have you been arrested?

7 A Yes, I have been before.

8 Q When was the last time you were arrested?

9 A To answer accurately, I don't remember the

10 year. It was for a speeding ticket that went

11 unpaid. And --

12 Q Got it.

13 A -- they released me in like four hours or

14 so.

15 Q Give me your best estimate of the year.

16 A Oh, my gosh, maybe '07 or '08, yeah,

17 because it was -- yeah, it was unpaid ticket. And I

18 missed court, and they made me pay the ticket, and

19 they released me.

20 Q Got it.

21 Other than that arrest, that single

22 arrest, have you ever been arrested at any other

23 time in your life?

24 A I have, tickets, I -- yeah, just --

25 Q Unpaid tickets?

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1 A Yeah, speeding ticket was -- the same --

2 it was the same thing, just unpaid speeding ticket.

3 Q Got it.

4 And so before the arrest you just told me

5 about that occurred in '07 or '08, when was the time

6 before that that you were arrested? How long ago?

7 A Probably -- it probably occurred after

8 that, maybe like -- I don't know. I don't know the

9 exact year. It might have occurred after '08, maybe

10 2010 possibly. It might have happened later than

11 that. I just know it was all the same thing. It

12 was all dealing with speeding -- traffic violations.

13 It was --

14 Q So the only thing that you -- the only

15 things that you've ever been arrested for in your

16 life is for unpaid speeding tickets?

17 A Yes, and like -- yeah, tickets, just

18 either parking or a speeding type ticket that dealt

19 with -- I remember that was -- I had missed court on

20 the ticket, and I was ordered to just pay the

21 ticket. And the judge just said from here on out,

22 just always make sure if you show up -- just make

23 sure you show up to court for your tickets, and this

24 will never -- won't happen.

25 Q Has it -- have you only been arrested two

Page 16

1 times?

2 A I think it's been twice for that, for the

3 same type of situation, which was always a traffic

4 violation.

5 Q You've never been arrested for any other

6 reason.

7 A No, no.

8 Q Were these both in the city of Atlanta?

9 A One, if I remember correct, happened --

10 gosh, this was so long ago. Stone Mountain.

11 Q Okay.

12 A Yeah. I remember Stone Mountain. The

13 other was -- I think it was East Point.

14 Q All right.

15 A I don't know if East Point and College

16 Park is the same, because I was at the little

17 courthouse over in the Main Street area. So people

18 kind of get it -- it's either College Park or East

19 Point. But they have a courthouse over there, so

20 that's where I was. I paid the ticket, which was a

21 bench thing because I didn't show up for the -- it

22 was a -- I was sick. It was the speeding. And I

23 ended up -- yeah, they released me that same day.

24 They released me that same day.

25 Q So you've never spent the night in prison?

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<p style="text-align: right;">Page 17</p> <p>1 A Never. Never in my -- never.</p> <p>2 Q Have you ever -- other than the two</p> <p>3 arrests that you've told me about, and your eviction</p> <p>4 proceedings --</p> <p>5 A Yes, sir.</p> <p>6 Q -- and your bankruptcy, have you ever been</p> <p>7 involved in any other criminal or civil legal</p> <p>8 proceeding?</p> <p>9 A Never been in a criminal at all. The only</p> <p>10 civil that I remember that I think is on my credit</p> <p>11 report was a judgment for old rent -- rental that I</p> <p>12 stayed.</p> <p>13 And the judge at that time ruled for me</p> <p>14 and ordered -- deducted something per the leasing</p> <p>15 person that I owed, which was the owner of the</p> <p>16 townhouse. And ordered them not to proceed any</p> <p>17 further and said, You all just work it out of the</p> <p>18 court. They dismissed it and said work it out. And</p> <p>19 the judge lowered the balance for me.</p> <p>20 Q Any other legal proceeding that you've</p> <p>21 been involved in?</p> <p>22 A No.</p> <p>23 Q Have you ever applied for any -- I know</p> <p>24 you applied for some unemployment benefits.</p> <p>25 Have you ever applied for any other</p>	<p style="text-align: right;">Page 19</p> <p>1 A Actually, they just cut some of my amount.</p> <p>2 I'm not receiving the maximum. I'm receiving I</p> <p>3 think like 150 or something, 153. I think that's</p> <p>4 it.</p> <p>5 Q And that's per --</p> <p>6 A It's per -- you just get it once a month.</p> <p>7 Q Right.</p> <p>8 A Yes, sir.</p> <p>9 Q All right. Let me show you just a couple</p> <p>10 of documents. I'm not going to ask you a lot of</p> <p>11 questions about them.</p> <p>12 (Exhibit 1 was marked for identification.)</p> <p>13 BY MR. STONE:</p> <p>14 Q The first thing I'm going to show you is</p> <p>15 your voluntary petition for bankruptcy in this case.</p> <p>16 And I'm just going to ask you to take a quick look</p> <p>17 at it. I'll show you a series of documents today.</p> <p>18 And each time I show you a document, I'm going to</p> <p>19 mark it with a little sticker and a number.</p> <p>20 So that's No. 1?</p> <p>21 A Yes, sir.</p> <p>22 Q So I'm showing you what's Exhibit No. 1.</p> <p>23 And my question to you is, is that your</p> <p>24 petition for bankruptcy that you filed in bankruptcy</p> <p>25 court here in Georgia?</p>
<p style="text-align: right;">Page 18</p> <p>1 governmental benefits, Social Security benefits --</p> <p>2 A Food stamps --</p> <p>3 Q -- food stamps.</p> <p>4 A -- does that apply?</p> <p>5 Q Yes.</p> <p>6 A Yes, sir.</p> <p>7 Q When did you apply for food stamps?</p> <p>8 A I do not remember the actual date, but I</p> <p>9 think it probably was after I was terminated, which</p> <p>10 probably --</p> <p>11 Q From Delta?</p> <p>12 A Yes, sir.</p> <p>13 Q Okay.</p> <p>14 A Which probably occurred around August --</p> <p>15 Q Yeah.</p> <p>16 A -- of 2015.</p> <p>17 But I have had stamps before that, like if</p> <p>18 my hours or something dropped, and my income -- if I</p> <p>19 wasn't making enough, you qualify for it. So I have</p> <p>20 had them like on and off ongoing. But once I was</p> <p>21 terminated, they gave me the maximum amount because</p> <p>22 they saw that I had -- the income.</p> <p>23 Q And are you still receiving food stamps?</p> <p>24 A Yes, sir.</p> <p>25 Q Still the maximum amount?</p>	<p style="text-align: right;">Page 20</p> <p>1 A You mean like is this what the attorney at</p> <p>2 that time gave me? Because I did a Chapter 13</p> <p>3 first. And then the attorney I had at the time</p> <p>4 advised, You don't have anything to -- really to</p> <p>5 work with. So she said, I'm telling you, I suggest</p> <p>6 you do a 7. I didn't want to do a 7 because I was</p> <p>7 trying to keep my car at the time. And she said,</p> <p>8 You -- please do a 7. That will help you better.</p> <p>9 So it went from a 13 to a 7.</p> <p>10 Q All right. I'm going to show you that --</p> <p>11 on page 1 --</p> <p>12 A Oh, there it is.</p> <p>13 Q You'll see that it's a Chapter 13</p> <p>14 bankruptcy. And this is a petition that was filed</p> <p>15 by you --</p> <p>16 A Yes.</p> <p>17 Q -- or on your behalf by your attorney in</p> <p>18 district court. I'm just asking you to confirm that</p> <p>19 for me.</p> <p>20 A Oh, yes, yes.</p> <p>21 Q All right. And then I'm going to show you</p> <p>22 one other document related to your bankruptcy.</p> <p>23 (Exhibit 2 was marked for identification.)</p> <p>24 (Discussion off the record.)</p> <p>25</p>

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<p>Page 21</p> <p>1 BY MR. STONE:</p> <p>2 Q So the next thing I'm going to show you is</p> <p>3 what's been marked as Exhibit 2. And ask if that's</p> <p>4 a statement of financial affairs that was filed on</p> <p>5 your behalf. Take your time and take a look at it</p> <p>6 and make sure you recognize it.</p> <p>7 A Would this have been -- because there was</p> <p>8 so many papers --</p> <p>9 Q Sure.</p> <p>10 A -- Attorney Stone, would this have been</p> <p>11 what my Chapter 13 attorney would have filed.</p> <p>12 Because I went between two attorneys for the 7 and</p> <p>13 the 13.</p> <p>14 Q (Indicating.)</p> <p>15 A This would be the paperwork that they</p> <p>16 filed?</p> <p>17 Q Yeah. You can see at the top here. This</p> <p>18 is something, first of all, that was filed in your</p> <p>19 Chapter 13 bankruptcy.</p> <p>20 A December.</p> <p>21 Q See where it says Chapter 13?</p> <p>22 A Uh-huh.</p> <p>23 Q And you see it was filed December of 2015.</p> <p>24 A Right. That was right around the time.</p> <p>25 Q Right.</p>	<p>Page 23</p> <p>1 Am I correct on that?</p> <p>2 A I haven't filed for me. But I helped my</p> <p>3 mother because my -- I've recently been filing --</p> <p>4 trying to help my mom out --</p> <p>5 Q Yes.</p> <p>6 A -- because she has some things going on</p> <p>7 that I'm trying to get taken care of for her because</p> <p>8 she's elderly.</p> <p>9 Q But you, for yourself, have never sought</p> <p>10 Social Security benefits for yourself.</p> <p>11 A No. I don't -- I -- no, I know I wouldn't</p> <p>12 qualify anyway.</p> <p>13 Q All right. Fair enough.</p> <p>14 (Exhibit 3 was marked for identification.)</p> <p>15 BY MR. STONE:</p> <p>16 Q Let me show you what's been marked as</p> <p>17 Exhibit No. 3. And ask if you recognize those as</p> <p>18 your responses to the interrogatories --</p> <p>19 A I looked at this.</p> <p>20 Q -- that Delta sent you? Yes?</p> <p>21 A That Delta sent me?</p> <p>22 Q That I sent you on --</p> <p>23 A Oh.</p> <p>24 Q -- on behalf of Delta.</p> <p>25 A Yes. This looks like what you sent me,</p>
<p>Page 22</p> <p>1 A Am I okay to look?</p> <p>2 Q Oh, you're more than okay. I expect you</p> <p>3 to. And make sure you recognize it as your</p> <p>4 statement of financial affairs.</p> <p>5 (Comment by Reporter.)</p> <p>6 (Discussion off the record.)</p> <p>7 BY MR. STONE:</p> <p>8 Q And then answer my question, which is is</p> <p>9 that the statement of financial affairs that was</p> <p>10 filed --</p> <p>11 A Yeah.</p> <p>12 Q -- on your behalf?</p> <p>13 And I assume it is your practice, and that</p> <p>14 you would have, consistent with that practice, told</p> <p>15 the truth in all of your filings in the bankruptcy</p> <p>16 court; correct?</p> <p>17 A Yes, sir.</p> <p>18 Q All right. So when you file something,</p> <p>19 and it's under oath, you're very careful to make</p> <p>20 sure that it's truthful; correct?</p> <p>21 A Yes, sir.</p> <p>22 Q All right. And I think you told me this,</p> <p>23 but just to be sure, I'm right you have never filed</p> <p>24 for disability benefits with the Social Security</p> <p>25 Administration.</p>	<p>Page 24</p> <p>1 yes, sir.</p> <p>2 Q Well, let's be clear, these are actually</p> <p>3 your responses, so this is what you would have sent</p> <p>4 me.</p> <p>5 A Sent you, yes, sir.</p> <p>6 Q All right. And you recognize it as such;</p> <p>7 correct?</p> <p>8 A Yes, sir.</p> <p>9 Q And when you responded to Delta's</p> <p>10 interrogatories, did you tell the truth?</p> <p>11 A Yes, sir.</p> <p>12 Q All right. And you said you reviewed this</p> <p>13 yesterday for a little while; correct?</p> <p>14 A Just for about 30 minutes.</p> <p>15 Q And is everything in this response still</p> <p>16 accurate and complete? Take as much time as you</p> <p>17 need to answer that question.</p> <p>18 A It's correct.</p> <p>19 Q All right. Let me -- hang on to that</p> <p>20 document because I'm going to ask you some questions</p> <p>21 about it.</p> <p>22 Turn to page 3 of Exhibit 3 for me. All</p> <p>23 right. And you'll see there I'm looking now at your</p> <p>24 response to Interrogatory No. 6.</p> <p>25 Do you see that?</p>

<p style="text-align: right;">Page 25</p> <p>1 A Yes.</p> <p>2 Q Okay. And these are the healthcare</p> <p>3 providers who have provided services to you for the</p> <p>4 last ten years; correct?</p> <p>5 A Yes --</p> <p>6 Q All right.</p> <p>7 A -- or I have a -- do I have to put my</p> <p>8 gynecologist in here?</p> <p>9 Q Well, it called for all of your healthcare</p> <p>10 providers.</p> <p>11 A Oh, okay.</p> <p>12 Q So let's talk -- we'll talk about that in</p> <p>13 a minute.</p> <p>14 Okay. Let me identify, first of all, the</p> <p>15 people that have been listed here. You first</p> <p>16 indicate Dr. Kelley from Peachtree Orthopaedics;</p> <p>17 correct?</p> <p>18 A Yes.</p> <p>19 Q And is Peachtree Orthopaedics and</p> <p>20 Dr. Kelley, is that who treated you for your</p> <p>21 shoulder injury when the bag fell?</p> <p>22 A Yes, it -- but it's not just shoulder.</p> <p>23 It's my shoulder, neck and back.</p> <p>24 Q But your --</p> <p>25 A -- and kind of -- he is, I think, a neck</p>	<p style="text-align: right;">Page 27</p> <p>1 A Did.</p> <p>2 Q -- for a psychologist.</p> <p>3 A Did.</p> <p>4 Q You're no longer seeing her?</p> <p>5 A No, she left that practice.</p> <p>6 Q Are you currently seeing any other</p> <p>7 psychologist?</p> <p>8 A I am not. I have recently been trying to</p> <p>9 get a new person that I have not yet reached out to.</p> <p>10 Q Okay. Have you identified somebody to</p> <p>11 reach out to?</p> <p>12 A I do have a name. I'll be honest, I -- I</p> <p>13 can get that to you later. I do not have it with</p> <p>14 me. I don't remember.</p> <p>15 Q But you've not seen that person, whoever</p> <p>16 it is.</p> <p>17 A No.</p> <p>18 Q And I think you told me that it's been</p> <p>19 probably a year since you saw Dr. Cherukupally?</p> <p>20 A Maybe a little less than a year. I can't</p> <p>21 say accurately, but it has been a while since I last</p> <p>22 saw her.</p> <p>23 Q And how long did she treat you for?</p> <p>24 A Probably maybe six months.</p> <p>25 Q Okay.</p>
<p style="text-align: right;">Page 26</p> <p>1 specialist and then -- yeah. He's a neck</p> <p>2 specialist, but he treated all of it, yeah.</p> <p>3 Q I didn't mean to be as narrow as that.</p> <p>4 Your orthopedic injury suffered when you</p> <p>5 had a fall of a bag; correct?</p> <p>6 A Yes, yeah, when --</p> <p>7 Q And that was in 2013; correct?</p> <p>8 A Was it '13 or was it '14? Gosh, I'm not</p> <p>9 accurate on the year. It was '13 or '14, but I know</p> <p>10 exactly it happened on March the 20th. And I do</p> <p>11 know it happened March, the 20th or the 21st, when</p> <p>12 my supervisor had to take me down to on-site</p> <p>13 therapy.</p> <p>14 Q Okay. All right. Well, we'll look at</p> <p>15 some documents in a little while that will clarify</p> <p>16 that.</p> <p>17 A Okay.</p> <p>18 Q But that's what Dr. Kelley at Peachtree</p> <p>19 Orthopaedics was treating you for; correct?</p> <p>20 A Yes, sir.</p> <p>21 Q And then you just told me a moment ago</p> <p>22 that Dr. -- I'm going to mispronounce it, but</p> <p>23 Cherukupally?</p> <p>24 A She.</p> <p>25 Q She is treating you or did treat you --</p>	<p style="text-align: right;">Page 28</p> <p>1 A It may be a little less than that.</p> <p>2 Q How many times did you --</p> <p>3 A She has done -- she has done surgery --</p> <p>4 what do you call it, an outpatient procedure on me</p> <p>5 as well.</p> <p>6 Q What outpatient procedure did she do on</p> <p>7 you?</p> <p>8 A It was dealing with my initial -- what I</p> <p>9 deal with my neck and my shoulder.</p> <p>10 Q Okay. So she's treating you for more than</p> <p>11 your psychological issues.</p> <p>12 A Yeah. She did do -- she has done that as</p> <p>13 well.</p> <p>14 Q All right. Is she a psychologist by</p> <p>15 training or is she a --</p> <p>16 A I never asked her.</p> <p>17 Q All right.</p> <p>18 A When she would treat me and talk with me,</p> <p>19 she just kind of knew a lot of things that I was</p> <p>20 going -- going through with. And per her, I guess,</p> <p>21 medical findings, she decided that she wanted to</p> <p>22 place me on what she placed me on.</p> <p>23 Q When did she place you on amitriptyline?</p> <p>24 A I do not know the date. I can't remember</p> <p>25 the date, because it's been a while since I saw her.</p>

<p style="text-align: right;">Page 29</p> <p>1 Q Give me your best estimate.</p> <p>2 A Oh, gosh, maybe right around -- let me</p> <p>3 see. Maybe October or September 2016. I did try to</p> <p>4 go back and see her. But when I went back, that's</p> <p>5 when I found out that she had left the practice.</p> <p>6 Q I got it.</p> <p>7 And how many times have you taken</p> <p>8 amitriptyline in your life?</p> <p>9 A Just only once she had prescribed it and</p> <p>10 thought that that would be something that would be</p> <p>11 best for what she -- where she thought I was at the</p> <p>12 time.</p> <p>13 Q I asked a poor question.</p> <p>14 How many times have you physically taken a</p> <p>15 pill?</p> <p>16 A I cannot answer accurately because I never</p> <p>17 counted.</p> <p>18 You want an estimate?</p> <p>19 Q (No response, indicating.)</p> <p>20 A I don't know. Again, just when I'm -- if</p> <p>21 I feel depressed or in a mood, it just kind of helps</p> <p>22 me, you know.</p> <p>23 Q Five times? Have you taken it five times</p> <p>24 in your life, approximately?</p> <p>25 A I've taken it more than five times. Maybe</p>	<p style="text-align: right;">Page 31</p> <p>1 A He also -- he knew about my injury or</p> <p>2 whatever. He talked to me about it. But he's never</p> <p>3 done any procedures or nothing like that. So we</p> <p>4 just more so talked about the depression and the</p> <p>5 things that I was kind of going through with and --</p> <p>6 Q Is Dr. Clavo a psychologist?</p> <p>7 A I never asked him if he is. He just read</p> <p>8 the notes per Dr. Cherukupally. And he just kind of</p> <p>9 emphasized what she -- what that doctor talked about</p> <p>10 with me.</p> <p>11 Q How many times did you see Dr. Clavo?</p> <p>12 A Once.</p> <p>13 Q Okay. Other than the three doctors that</p> <p>14 are listed in this response to Interrogatory No. 6,</p> <p>15 Dr. Kelley, Dr. Cherukupally and Dr. Clavo, who else</p> <p>16 have you seen for any healthcare condition in the</p> <p>17 last ten years?</p> <p>18 A Oh, Dr. Melinda Miller-Thrasher.</p> <p>19 Q She's your OB/GYN?</p> <p>20 A Yes.</p> <p>21 Q Who else?</p> <p>22 A Dr. Thrasher. I've been to the ER. I</p> <p>23 just don't know the doctors' names, because they</p> <p>24 change the doctors so much.</p> <p>25 Q Yeah.</p>
<p style="text-align: right;">Page 30</p> <p>1 eight times.</p> <p>2 Q Okay. That's good enough.</p> <p>3 Other than Dr. Cherukupally, have you seen</p> <p>4 any other person for any psychological conditions?</p> <p>5 A Actually, Dr. Clavo, who's on here, I --</p> <p>6 he kind of had the same kind of conversations that</p> <p>7 Cherukupally had with me and -- how do you say it?</p> <p>8 He kind of -- what's the word I'm looking for? He</p> <p>9 was in agreeance with what she had prescribed, based</p> <p>10 off of what he talked about with me.</p> <p>11 Q Any other doctor, other than that, that</p> <p>12 you've ever seen for any psychological condition in</p> <p>13 your life?</p> <p>14 A I actually -- not at this time. I can't</p> <p>15 remember.</p> <p>16 Q Is there anything I could do to help you</p> <p>17 remember or refresh your recollection?</p> <p>18 A No. I -- I'll just say no.</p> <p>19 Q So you can't recall ever seeing anybody</p> <p>20 else for any psychological condition.</p> <p>21 A I cannot.</p> <p>22 Q All right. And other than what you just</p> <p>23 described that Dr. Clavo talked to you about, did</p> <p>24 Dr. Clavo talk to you about any other or treat you</p> <p>25 for any other condition?</p>	<p style="text-align: right;">Page 32</p> <p>1 A None at this time.</p> <p>2 Q All right. How many times have you been</p> <p>3 to the ER?</p> <p>4 A I can't say accurately, but maybe twice in</p> <p>5 the past maybe say year.</p> <p>6 Q Okay.</p> <p>7 A Maybe twice possibly.</p> <p>8 Q All right. What ER did you go to?</p> <p>9 A I normally go to -- what's this --</p> <p>10 Crawford Long Emory, yes, sir.</p> <p>11 Q And why did you go to the ER in the last</p> <p>12 year?</p> <p>13 A I actually was having some chest pains</p> <p>14 during one situation, chest pains, anxiety, which is</p> <p>15 actually what the doctor -- when I just kind of</p> <p>16 started explaining everything to her she said,</p> <p>17 You're having an anxiety attack.</p> <p>18 Q All right. And that was within the last</p> <p>19 year?</p> <p>20 A Yes, sir.</p> <p>21 Q All right. Did she prescribe anything for</p> <p>22 you?</p> <p>23 A She prescribed a Valium.</p> <p>24 Q One Valium?</p> <p>25 A Well, she gave me -- they gave me that</p>

<p style="text-align: right;">Page 33</p> <p>1 there that particular evening, and then she</p> <p>2 prescribed me some. I did not fill those.</p> <p>3 Q All right. Did you stay overnight in the</p> <p>4 ER?</p> <p>5 A Just through the morning. But, yeah, they</p> <p>6 didn't keep me in there.</p> <p>7 And, oh, I just don't remember. I</p> <p>8 actually -- I think a year, year and a half, prior</p> <p>9 they kept me for three days.</p> <p>10 Q All right.</p> <p>11 A I forgot about that. They kept me for</p> <p>12 three days at Emory, because the cardiologist wanted</p> <p>13 to run some extensive stuff on my heart, because I</p> <p>14 was anxiety and having chest pains.</p> <p>15 Q That was about a year ago, so 2016,</p> <p>16 roughly?</p> <p>17 A It might have been around then.</p> <p>18 Q That's your --</p> <p>19 A I have no problem -- I can try to find</p> <p>20 that.</p> <p>21 Q But your best estimate was about a year</p> <p>22 ago?</p> <p>23 A Yes, sir, about a year and a half ago,</p> <p>24 year, year and a half ago.</p> <p>25 Q Sometime in 2016.</p>	<p style="text-align: right;">Page 35</p> <p>1 You have to tell me who -- you have to answer my</p> <p>2 question.</p> <p>3 A The person -- am I allowed -- can I say --</p> <p>4 am I allowed to say a name?</p> <p>5 Q You're allowed to say -- you're allowed to</p> <p>6 give a truthful answer to the question.</p> <p>7 A Oh, okay. Well, a paralegal person.</p> <p>8 Q Okay. And who is -- what is that person's</p> <p>9 name?</p> <p>10 A Gary.</p> <p>11 Q What's Gary's last name?</p> <p>12 A Pernice.</p> <p>13 Q Pernice?</p> <p>14 A P-E-R-N-I-C-E.</p> <p>15 Q All right. And who is Mr. Pernice?</p> <p>16 A He's a paralegal --</p> <p>17 Q All right.</p> <p>18 A -- from what I've been told.</p> <p>19 Q Is he at some law firm?</p> <p>20 A I do know that -- per what he has told me,</p> <p>21 he helps prepare for various attorneys in the</p> <p>22 Atlanta area.</p> <p>23 Q He works on his own?</p> <p>24 A I never asked him. I just know he did</p> <p>25 state he works for a lot of attorneys and helps them</p>
<p style="text-align: right;">Page 34</p> <p>1 A Yes, sir.</p> <p>2 Q Any other trips to the ER, the --</p> <p>3 A None that I can think of right now. It's</p> <p>4 been a lot.</p> <p>5 Q Okay.</p> <p>6 (Exhibit 4 was marked for identification.)</p> <p>7 BY MR. STONE:</p> <p>8 Q Let me show you what's been marked as</p> <p>9 Exhibit No. 4, if I can, Ms. Stevenson.</p> <p>10 (Discussion off the record.)</p> <p>11 BY MR. STONE:</p> <p>12 Q And I'm showing you Exhibit No. 4.</p> <p>13 And I'm going to ask you, first of all, is</p> <p>14 that your responses to Delta's document request in</p> <p>15 this case?</p> <p>16 A Yes.</p> <p>17 Q Yes?</p> <p>18 A Yes, sir.</p> <p>19 Q Who prepared the Exhibit No. 3, the</p> <p>20 interrogatory responses, and this Exhibit No. 4 for</p> <p>21 you?</p> <p>22 A This one? Who --</p> <p>23 Q Both 3 and 4, who prepared those?</p> <p>24 A Am I allowed to? Can --</p> <p>25 Q You're not only allowed to, you have to.</p>	<p style="text-align: right;">Page 36</p> <p>1 prepare cases.</p> <p>2 Q Okay. How did you come in contact with</p> <p>3 Mr. Pernice?</p> <p>4 A I was referred to him actually by a lady.</p> <p>5 To this day I do not even know the lady. I just</p> <p>6 kind of met her in passing during all of my</p> <p>7 bankruptcy stuff. And her, just kind of knowing</p> <p>8 some of the things that I've been going through with</p> <p>9 trying to get my job and stuff back, she said, I'll</p> <p>10 refer somebody to you that I think can help you, you</p> <p>11 know.</p> <p>12 Q And that -- and it was Mr. Pernice?</p> <p>13 A It was -- she referred me to him.</p> <p>14 Q And how many times have you spoken to</p> <p>15 Mr. Pernice about your -- about this case?</p> <p>16 A I have not counted the times. I've spoken</p> <p>17 to him on and off quite a few times. We do go</p> <p>18 through periods where -- because he is extremely,</p> <p>19 extremely busy working with your colleagues, he --</p> <p>20 we may go months, you know, and not talk, and I just</p> <p>21 handle everything myself.</p> <p>22 So I don't know -- I can't say, oh, I</p> <p>23 talked to him ten times, because I never count. I</p> <p>24 just -- when I can reach him, I can reach him, or</p> <p>25 when he reaches out to me, he'll -- apologizes and</p>

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<p>Page 37</p> <p>1 says, Hey, I've been -- you know, we had a heck of a</p> <p>2 case going on. I had to do this; I had to do that.</p> <p>3 He catches me up on everything. And then he'll go,</p> <p>4 Okay. Where are we? And then we get right to it.</p> <p>5 Q So he's providing you periodic legal</p> <p>6 advice in the case?</p> <p>7 A He can't provide me legal advice because</p> <p>8 he's not an attorney. But I know he's a paralegal</p> <p>9 based off what he's -- I'm just stating what he</p> <p>10 stated to me; that, you know, he's a paralegal, he</p> <p>11 works for various firms in Atlanta, and he assists</p> <p>12 attorneys with gathering information and putting</p> <p>13 cases together. That's what he --</p> <p>14 Q If he's not providing you legal advice,</p> <p>15 why are you talking to him? What is he giving you?</p> <p>16 A I don't understand that question.</p> <p>17 Q Sure.</p> <p>18 A Well --</p> <p>19 Q What do you all talk about?</p> <p>20 A If I write something up, because I am</p> <p>21 pro se, he may correct me and say, That's quite --</p> <p>22 that's not quite how -- that's not the verbiage or</p> <p>23 something like that, because I'm not an attorney.</p> <p>24 I, you know --</p> <p>25 Q So he's giving you advice on the filings</p>	<p>Page 39</p> <p>1 through with. And I write things up. I actually</p> <p>2 write up, and he'll -- I'll go over it with him, and</p> <p>3 then he may scratch out and say no.</p> <p>4 Q Well, for example, this -- you're not an</p> <p>5 attorney. I assume you don't know how to do general</p> <p>6 objections to document requests; correct? He gave</p> <p>7 you all this language, correct, on page 1 of</p> <p>8 Exhibit 4?</p> <p>9 A That's a fair -- what's the wording I</p> <p>10 guess I'm trying --</p> <p>11 Q That's a fair statement?</p> <p>12 A That's fair that you said that.</p> <p>13 Q Fair enough.</p> <p>14 All right. Did Mr. Pernice -- did he</p> <p>15 write your complaint as well in the case?</p> <p>16 A You mean my initial when I filed it?</p> <p>17 Q (No response, indicating.)</p> <p>18 A He didn't write the complaint. I actually</p> <p>19 wrote the complaint. But I went over everything,</p> <p>20 and it was redrafted, is that correct to say, per</p> <p>21 him.</p> <p>22 Q Okay. Did he type it up or did you?</p> <p>23 A How did that go? No, he sent it to me.</p> <p>24 Q All right.</p> <p>25 A Yeah. It was --</p>
<p>Page 38</p> <p>1 that you're making in the case.</p> <p>2 A Sometimes if I write something or -- and I</p> <p>3 run it by him, he'll say, you know, Well, I can't</p> <p>4 give you legal advice, but no, that's not the</p> <p>5 correct thing to say.</p> <p>6 Q All right.</p> <p>7 A Because I don't -- I don't know law like</p> <p>8 that.</p> <p>9 Q Have you talked to him more than ten times</p> <p>10 about this case?</p> <p>11 A Again, I don't -- I don't think I have.</p> <p>12 Because, again, we go -- during this whole process,</p> <p>13 it's been a lot of long periods of time where I have</p> <p>14 not talked to him for three months or two months at</p> <p>15 a time. And I just kind of been feeling my way</p> <p>16 through, I guess -- what is the word I'm thinking --</p> <p>17 the legal -- well, the information that he's given</p> <p>18 me, and I just try to word it as best I can, as</p> <p>19 educational as I can --</p> <p>20 Q But did he --</p> <p>21 A -- pro se.</p> <p>22 Q He drafted Exhibit No. 4; correct? You</p> <p>23 didn't draft that.</p> <p>24 A I -- well, I gave him the facts. I guess</p> <p>25 the things that I have been receiving or going</p>	<p>Page 40</p> <p>1 Q All right.</p> <p>2 A It was e-mailed, yeah.</p> <p>3 Q He e-mailed -- he wrote it and e-mailed it</p> <p>4 to you?</p> <p>5 A I think he either -- to answer it honestly</p> <p>6 because I -- it was either e-mailed -- I think it</p> <p>7 was e-mailed, or did I meet with him and he gave it</p> <p>8 to me, and it was like I had to go file it.</p> <p>9 Q Got it.</p> <p>10 A But answering you honestly, I wrote it up,</p> <p>11 and he went through it and was like --</p> <p>12 Q This isn't how you do a complaint. Let me</p> <p>13 show you how?</p> <p>14 A Yes, sir.</p> <p>15 Q All right. I'm going to ask you some</p> <p>16 questions now about documents that you have in your</p> <p>17 possession.</p> <p>18 A Okay.</p> <p>19 Q And whether you've given us everything</p> <p>20 that you have at this point or you still have some</p> <p>21 material to give us.</p> <p>22 A Yes, sir.</p> <p>23 Q So have you given us all of your tax</p> <p>24 returns?</p> <p>25 A Did you get the most recent one that I</p>

<p style="text-align: right;">Page 41</p> <p>1 filed?</p> <p>2 I think -- the only one that I think I</p> <p>3 have not given to you is 2012. And I think I had</p> <p>4 e-mailed you -- it's because 2012, my income tax</p> <p>5 preparer, for some crazy reason, she always -- she</p> <p>6 and he. This is two different people I go between</p> <p>7 to do my taxes. She -- for some reason, 2012 she</p> <p>8 ended up leaving Jackson Hewitt at that time, and I</p> <p>9 never got a copy. She usually likes give me all of</p> <p>10 the copy of 2013, 2014, 2015, 2016, like all my</p> <p>11 things that she -- the taxes that she's done.</p> <p>12 But that particular one, there was</p> <p>13 something to the effect, I no longer am at Jackson</p> <p>14 Hewitt. You're going to have to just call them.</p> <p>15 Some kind of way the software or something that they</p> <p>16 were using on the computer. And because she had</p> <p>17 left the firm, she never was able to generate that</p> <p>18 particular one. But she said it was as easy as --</p> <p>19 all I would have had to do is just go to Jackson</p> <p>20 Hewitt. She said they easily just print it out.</p> <p>21 Q But you haven't had a chance to do that</p> <p>22 yet?</p> <p>23 A Yeah. Well, what it is, is I want to</p> <p>24 say -- I remember her saying, I think, it was -- at</p> <p>25 that time we had that conversation, it was a --</p>	<p style="text-align: right;">Page 43</p> <p>1 you. I have nothing to hide.</p> <p>2 Q You've copied that entire folder and given</p> <p>3 it to me, yes or no?</p> <p>4 A Well, there's not nothing to copy. It's</p> <p>5 just everything that I submit, like to the court or</p> <p>6 whatever, and everything in discovery, especially</p> <p>7 the most recent things I've sent to you, that is</p> <p>8 all, I think, I have at this point.</p> <p>9 Q Do you have e-mail -- do you keep e-mails?</p> <p>10 A Yeah, I do. I keep my e-mails sometimes.</p> <p>11 Q Have you gone through your e-mails to look</p> <p>12 for your communications from Delta at this point, or</p> <p>13 you haven't done that yet?</p> <p>14 A I don't think Delta has -- Delta has</p> <p>15 directly sent me e-mails. Usually Delta just -- you</p> <p>16 all mail stuff to me. It usually has been mailed.</p> <p>17 Q All right. Have you checked to see if you</p> <p>18 have any e-mails from Delta?</p> <p>19 A Recently?</p> <p>20 Q At all, any e-mails at all from Delta.</p> <p>21 A Since I have not been there.</p> <p>22 Q Right, or before that time.</p> <p>23 A Yeah. My e-mail -- because I know they</p> <p>24 can't send me anything, because I don't have a Delta</p> <p>25 e-mail -- well, that Delta e-mail. I do have an</p>
<p style="text-align: right;">Page 42</p> <p>1 Q Stop. I'm not -- I'm asking you a very</p> <p>2 simple question.</p> <p>3 A Oh, okay.</p> <p>4 Q You haven't given us your 2012 return.</p> <p>5 A No.</p> <p>6 Q Have you gone to Jackson Hewitt to get it</p> <p>7 yet?</p> <p>8 A I have not done that.</p> <p>9 Q Why not?</p> <p>10 A I just have not gotten it because of all</p> <p>11 the things that I'm dealing with, Ben, a lot. I</p> <p>12 can't --</p> <p>13 Q Do you keep a diary of communications that</p> <p>14 you've had with Delta?</p> <p>15 A I do not keep a diary. I just -- when</p> <p>16 they have sent me stuff, or when you sent me stuff,</p> <p>17 I just -- well, I don't have a packet like that, but</p> <p>18 I have like a folder. I just -- I just put it all</p> <p>19 and just keep it --</p> <p>20 Q Have you given us everything that's in</p> <p>21 that folder?</p> <p>22 A Yes. I think I've given you everything in</p> <p>23 there, with the exception of the 2012 ones that I</p> <p>24 just have not went to Jackson Hewitt and got. I</p> <p>25 haven't, what do you call it, kept anything from</p>	<p style="text-align: right;">Page 44</p> <p>1 e-mail, but I don't have that one.</p> <p>2 No. I don't think I have e-mail --</p> <p>3 everything that they've sent me, to my knowledge --</p> <p>4 Q Listen to my question.</p> <p>5 Have you gone and looked through your</p> <p>6 e-mails to see if you have any e-mails from Delta?</p> <p>7 Have you done that yet?</p> <p>8 A I -- no, because they've never sent me any</p> <p>9 e-mails. They send everything by mail, to my</p> <p>10 understanding. I've just gotten everything in the</p> <p>11 mail.</p> <p>12 Q Do you have any e-mails or other documents</p> <p>13 from the time that you were working at Delta? Have</p> <p>14 you retained any of those?</p> <p>15 A Oh, I sent it to you, yeah, I did.</p> <p>16 Is that what you're asking me?</p> <p>17 Q What I'm trying -- here's what I'm trying</p> <p>18 to find out, Ms. Stevenson.</p> <p>19 During the time -- you were at Delta for a</p> <p>20 number of years.</p> <p>21 A Almost ten, yeah.</p> <p>22 Q During that time, you would have received</p> <p>23 a number of communications from Delta, correct --</p> <p>24 A Uh-huh.</p> <p>25 Q -- by mail, by e-mail or otherwise;</p>

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<p>Page 45</p> <p>1 correct?</p> <p>2 A Uh-huh. Okay. Can I --</p> <p>3 Q Listen to my question.</p> <p>4 A Okay.</p> <p>5 Q Am I correct on that?</p> <p>6 A Yes.</p> <p>7 Q Okay. Do you -- have you gone and done a</p> <p>8 search at your house for all of the communications</p> <p>9 that you've gotten from Delta during your employment</p> <p>10 or thereafter? Have you looked for those yet?</p> <p>11 A I have looked, and I didn't know that I</p> <p>12 was supposed to be looking like for old e-mails from</p> <p>13 when I worked there, because I never -- I love my</p> <p>14 career so much, I never -- I never anticipated that</p> <p>15 I wouldn't be able to, you know, like correspond or,</p> <p>16 you know, get e-mails.</p> <p>17 So I wasn't necessarily saving or anything</p> <p>18 like that. Like if something got sent to a personal</p> <p>19 e-mail per like from my Delta, because I thought I</p> <p>20 would still -- you know, I thought I would still be</p> <p>21 working my job.</p> <p>22 Q I'm asking a really simple question,</p> <p>23 Ms. Stevenson.</p> <p>24 You got e-mails; correct?</p> <p>25 A Yes, yes.</p>	<p>Page 47</p> <p>1 that way, and then it will just pop up. And I</p> <p>2 just -- I printed out, based off of what I</p> <p>3 remembered my supervisors forwarded to me at the</p> <p>4 time, yeah. At the time, I was -- I was getting</p> <p>5 awards, and what they call, I guess --</p> <p>6 Q I'm not asking you about that. All I</p> <p>7 asked is how you looked for your e-mails.</p> <p>8 So you pulled up your e-mail; correct?</p> <p>9 A Yeah.</p> <p>10 Q Did you look at every single e-mail that</p> <p>11 you had historically?</p> <p>12 A Yes, I did, I did, and those are the ones</p> <p>13 that I could -- that I printed out and gave to you.</p> <p>14 Q How did you -- did you look just one by --</p> <p>15 obviously, you have e-mails other than from Delta.</p> <p>16 Did you look one by one through your</p> <p>17 e-mails?</p> <p>18 A Yes.</p> <p>19 (Comment by Reporter.)</p> <p>20 (Discussion off the record.)</p> <p>21 BY MR. STONE:</p> <p>22 Q I'm going to ask you a very specific, very</p> <p>23 precise question, Ms. Stevenson.</p> <p>24 To look for your e-mails --</p> <p>25 A Uh-huh.</p>
<p>Page 46</p> <p>1 Q Have you gone and looked for e-mails from</p> <p>2 Delta that you have at any time? Have you done that</p> <p>3 yet?</p> <p>4 A No -- well, yes, I have, which are the</p> <p>5 ones that I -- that I had printed out that I</p> <p>6 actually faxed to you, if that makes sense to you,</p> <p>7 what I just said.</p> <p>8 Q So you do not have any e-mails from Delta,</p> <p>9 other than what you've sent me.</p> <p>10 A None that I know of.</p> <p>11 Q Have you looked for any?</p> <p>12 A Well, I have looked through them. And the</p> <p>13 ones that I e-mailed -- the ones that I faxed to</p> <p>14 you, are the only ones that -- that I found in my</p> <p>15 personal e-mail or my e-mail that I have, which is</p> <p>16 what I printed out, per e-mails that were sent to me</p> <p>17 at the time from my supervisors at Delta. And they</p> <p>18 sent them to me. Then I get them. And I'd print</p> <p>19 them out, if I need to print them out, which is what</p> <p>20 you have. That's all I have.</p> <p>21 Q How did you look for these e-mails?</p> <p>22 A How?</p> <p>23 Q Yeah.</p> <p>24 A Well, just going through my -- my</p> <p>25 personal -- like if you type in like Delta, yeah,</p>	<p>Page 48</p> <p>1 Q -- did you do a word search for all Delta</p> <p>2 e-mails?</p> <p>3 A I just did Delta. Like I'll type in</p> <p>4 Delta, and it just -- things would just pop up.</p> <p>5 Q What e-mail account did you look at for</p> <p>6 your Delta e-mails?</p> <p>7 A My Gmail or my Yahoo --</p> <p>8 Q And what are those two --</p> <p>9 A -- which I rarely use --</p> <p>10 Q -- e-mail addresses?</p> <p>11 A It's Q-U-A-N-I-A-H underscore S at Yahoo,</p> <p>12 which I rarely even use. I don't even really use</p> <p>13 that e-mail that much anymore. And then my Gmail,</p> <p>14 which is the one that I mostly use. It's</p> <p>15 Quaniah2011 at gmail dot com. That's the one I'm</p> <p>16 usually on.</p> <p>17 Q And you looked at both of those e-mails</p> <p>18 and searched for the word Delta in those e-mails.</p> <p>19 A Uh-huh.</p> <p>20 Q You have to say yes or no.</p> <p>21 A Yes.</p> <p>22 Q What about hard copy documents that Delta</p> <p>23 has mailed to you; have you looked for those yet?</p> <p>24 A I e-mailed -- no. I think that I faxed</p> <p>25 some to you.</p>

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<p style="text-align: right;">Page 49</p> <p>1 Q That's not my question.</p> <p>2 A Oh.</p> <p>3 Q Have you looked for all hard copy</p> <p>4 documents that Delta has sent to you at any time?</p> <p>5 A I have at various times. I have not</p> <p>6 lately been able to locate if there are any more at</p> <p>7 the present time, because I have some things in</p> <p>8 storage that I had not been able to put my hands on.</p> <p>9 Q Where are those documents in storage?</p> <p>10 A What Delta has sent me? They -- if</p> <p>11 they're there, they would be possibly in a -- maybe</p> <p>12 one of my book bags or something like that.</p> <p>13 Q Why have you not looked for those yet?</p> <p>14 A Because I was not able to pay the bill.</p> <p>15 Q What bill?</p> <p>16 A My storage bill and --</p> <p>17 Q I got you.</p> <p>18 So you have documents in storage that you</p> <p>19 cannot access because you haven't paid your storage</p> <p>20 bill.</p> <p>21 A Yes, sir.</p> <p>22 Q What storage location are those at?</p> <p>23 A If they're there -- and you're talking</p> <p>24 about what Delta has mailed to me since the whole</p> <p>25 process -- if they're there, it would be Iron Horse,</p>	<p style="text-align: right;">Page 51</p> <p>1 correct?</p> <p>2 A The bill -- the bill -- yes, the bill --</p> <p>3 because of that, that's why I had not been able,</p> <p>4 because they lock you out.</p> <p>5 Q Have you gone and asked to get in?</p> <p>6 A They -- Kelley would -- they -- she will</p> <p>7 not -- like until the --</p> <p>8 Q Have you asked her if you can get it?</p> <p>9 A Oh, well, I had, yes, and it was --</p> <p>10 Q When did you ask her to get in?</p> <p>11 A I spoke with her last week. And it was --</p> <p>12 if the bill is not paid, they don't let anybody in</p> <p>13 there, unless the bill is paid. That's their</p> <p>14 policy. If the bill is behind, and the bill is</p> <p>15 almost -- it was almost three months behind.</p> <p>16 Q So she told you -- you asked her</p> <p>17 specifically, May I come in, and she said no?</p> <p>18 A Yes, I've asked her, because I even tried</p> <p>19 to see if I could partial pay, and they were, no,</p> <p>20 they only take full payments. I asked them if they</p> <p>21 could deduct late fees. They said -- everything was</p> <p>22 a no -- was a no, Attorney Stone, they couldn't do</p> <p>23 that.</p> <p>24 Q How much do you owe?</p> <p>25 A How much do I owe on that deal? It's paid</p>
<p style="text-align: right;">Page 50</p> <p>1 which is off of South Cobb Drive.</p> <p>2 Q Let me be clear. I'm talking about all</p> <p>3 documents that Delta has sent you at any time,</p> <p>4 during your employment or thereafter.</p> <p>5 A Oh, during my employment. I mean yes.</p> <p>6 I'm pretty sure I have my Delta uniforms and all of</p> <p>7 that in my storage, my documents, all of that. If</p> <p>8 they're there, they would be in storage. They</p> <p>9 wouldn't be with me, because I have a lot of things</p> <p>10 that -- in storage that I had not been able to</p> <p>11 access because the bill -- I didn't look for them</p> <p>12 because the bill was so behind.</p> <p>13 And I had just gotten a call less than a</p> <p>14 week ago about they were trying to auction my stuff</p> <p>15 off, so I had to deal with something with that.</p> <p>16 Q All right. What about documents that</p> <p>17 you've received or sent -- received from or sent to</p> <p>18 the EEOC; have you looked for those documents?</p> <p>19 A Those too -- some of them, I think, that I</p> <p>20 have looked for, I think I've sent to you. And then</p> <p>21 some of them, same thing, would possibly be in one</p> <p>22 of my book bags in my storage unit.</p> <p>23 Q All right. And to be clear, while you</p> <p>24 have not gone out -- because the bill is behind you</p> <p>25 have not gone out to look for those documents;</p>	<p style="text-align: right;">Page 52</p> <p>1 now.</p> <p>2 Q Okay. So you can access it now?</p> <p>3 A Yes.</p> <p>4 Q When did you pay it?</p> <p>5 A Just -- my father actually paid it a day</p> <p>6 or so ago, which was not in time enough to get that</p> <p>7 information for you, because it just got paid, I</p> <p>8 think, a day or two ago.</p> <p>9 Q All right.</p> <p>10 A So that's why.</p> <p>11 Q Do you have any documents in your</p> <p>12 possession relating to efforts you made to find a</p> <p>13 job after you left Delta?</p> <p>14 A Do I have any documents --</p> <p>15 Q Uh-huh.</p> <p>16 A -- of what?</p> <p>17 Q Efforts you made to find a job after you</p> <p>18 lost your job at Delta.</p> <p>19 A I don't think I have any documents,</p> <p>20 because most things now, the same when I was at the</p> <p>21 Department of Labor, you have to -- everything is so</p> <p>22 online. So to answer honestly, I wasn't keeping</p> <p>23 documents or anything. I just would -- I'm the type</p> <p>24 of person I'll just go in and, you know, see if an</p> <p>25 establishment is hiring. And the next thing they</p>

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<p style="text-align: right;">Page 53</p> <p>1 say is, You got to go online or whatever. So</p> <p>2 everything was kind of done online or by phone</p> <p>3 call --</p> <p>4 Q So you --</p> <p>5 A -- at that time.</p> <p>6 Q And you didn't print out, for instance,</p> <p>7 any job applications that you made.</p> <p>8 A No, I don't -- because everything was like</p> <p>9 so electronic, stuff that I had applied for. Like I</p> <p>10 did apply for some stuff over at Southwest. I</p> <p>11 applied for some stuff at --</p> <p>12 Q I asked -- I didn't ask you --</p> <p>13 A Oh.</p> <p>14 Q -- those questions, Ms. Stevenson.</p> <p>15 All I asked you is whether you printed out</p> <p>16 job applications.</p> <p>17 A No. I never printed it out. They did</p> <p>18 give me some responses back, the companies, e-mail,</p> <p>19 but I did not print them out. They're just --</p> <p>20 Q They're on your e-mail now?</p> <p>21 A If I did not erase them, they should be.</p> <p>22 Q Okay. So you've got e-mail -- you've got</p> <p>23 e-mail responses --</p> <p>24 A Yeah.</p> <p>25 Q -- back that are on your e-mail.</p>	<p style="text-align: right;">Page 55</p> <p>1 A Oh, yes, I'm sorry.</p> <p>2 Q Do you have any documents relating to</p> <p>3 those travel benefits? And I'm talking in the</p> <p>4 broadest possible way. Any documents relating to</p> <p>5 your use of those benefits, your reservations on</p> <p>6 DeltaNet, anything, related to your use of travel</p> <p>7 benefits?</p> <p>8 A I can't answer that question effectively</p> <p>9 because Delta has a record of everything I've ever</p> <p>10 flown on.</p> <p>11 Q I'm not asking about Delta's records. I'm</p> <p>12 asking what you have, Ms. Stevenson.</p> <p>13 Do you have any records?</p> <p>14 A All of my records, I'm saying, would have</p> <p>15 been within my employee thing, my e-mail or my</p> <p>16 TravelNet, whenever I would book. I guess when we</p> <p>17 get to that part of everything, they have every --</p> <p>18 they have my entire record.</p> <p>19 Q So you have nothing.</p> <p>20 A No. I -- again, I wasn't expecting that I</p> <p>21 wouldn't be there so I -- all of my stuff was where</p> <p>22 I could access while I was there. Once I wasn't</p> <p>23 there, I -- I haven't been able to go in and like</p> <p>24 look and see. Even with my regular e-mail, like any</p> <p>25 of my nonrev stuff, because everything to my</p>
<p style="text-align: right;">Page 54</p> <p>1 A Uh-huh.</p> <p>2 Q You've not printed those out yet and given</p> <p>3 those to me.</p> <p>4 A I've never printed them out.</p> <p>5 Q And you've not --</p> <p>6 A I've just --</p> <p>7 Q You haven't done anything to give them to</p> <p>8 me.</p> <p>9 (Comment by Reporter.)</p> <p>10 (Discussion off the record.)</p> <p>11 BY MR. STONE:</p> <p>12 Q You have not printed those out yet.</p> <p>13 They're on your e-mail; correct?</p> <p>14 A Yes. They might be on the e-mail, if I</p> <p>15 didn't erase them.</p> <p>16 Q All right. Do you have any documents</p> <p>17 relating to your nonrevenue travel benefits at</p> <p>18 Delta?</p> <p>19 A Do I have any what? Could you repeat the</p> <p>20 question.</p> <p>21 Q Sure. During the time that you were at</p> <p>22 Delta you had pass benefits, nonrevenue travel</p> <p>23 benefits.</p> <p>24 A Uh-huh.</p> <p>25 Q You have to say yes or no?</p>	<p style="text-align: right;">Page 56</p> <p>1 understanding --</p> <p>2 Q You've got to stop. Just answer my</p> <p>3 question, and then we'll move on. Okay?</p> <p>4 Next question, do you have any</p> <p>5 communications with any of your travel companions</p> <p>6 about Delta's nonrevenue travel benefits?</p> <p>7 A What could you -- what are you asking me</p> <p>8 questionwise?</p> <p>9 Q Any, for example --</p> <p>10 A Do I have any communications with what?</p> <p>11 Q For instance, with Mr. Dais, who was your</p> <p>12 travel companion --</p> <p>13 A Yes.</p> <p>14 Q -- correct?</p> <p>15 Do you have any communications with</p> <p>16 Mr. Dais about his use of nonrevenue travel</p> <p>17 benefits?</p> <p>18 A Now? I'm -- I don't understand the</p> <p>19 question. I don't --</p> <p>20 Q Do you have any communications with</p> <p>21 Mr. Dais --</p> <p>22 A Uh-huh.</p> <p>23 Q -- about nonrevenue travel benefits?</p> <p>24 A No.</p> <p>25 Q All right. So, for example, no e-mails or</p>

<p style="text-align: right;">Page 57</p> <p>1 texts where you're making travel reservations for</p> <p>2 him.</p> <p>3 A Are you talking when I was employed? I'm</p> <p>4 just -- I'm just trying to understand. Are you</p> <p>5 talking about when I'm employed?</p> <p>6 Q I'm talking about anytime, anywhere,</p> <p>7 anyplace. I'm asking whether you have any</p> <p>8 communications.</p> <p>9 A I communicated with him when I was -- I'm</p> <p>10 saying as far as when I was employed, but not now</p> <p>11 because I'm not employed. So he doesn't nonrev now.</p> <p>12 Q Did you have any communications with</p> <p>13 Mr. Dais during the time --</p> <p>14 A Yes.</p> <p>15 Q -- that you were employed --</p> <p>16 A Yes, when I was --</p> <p>17 Q -- about nonrevenue travel benefits?</p> <p>18 A Yes.</p> <p>19 Q Okay.</p> <p>20 A Yes. I -- when I was employed. That's</p> <p>21 what I was trying to understand. When I was</p> <p>22 employed. That was my boyfriend so --</p> <p>23 Q Do you have e-mails or texts or other</p> <p>24 documents that would reflect those communications?</p> <p>25 A Just when I would book his travel for</p>	<p style="text-align: right;">Page 59</p> <p>1 don't -- that's what I'm saying, I don't really</p> <p>2 understand. I wouldn't have anything now, or even</p> <p>3 then, other than my Delta TravelNet when I would</p> <p>4 book his travel. And say, Hey, you're booked for</p> <p>5 whatever.</p> <p>6 Q There are no e-mails, for example, where</p> <p>7 Mr. Dais says, Can you book some travel for me?</p> <p>8 A Within my Delta thing, it would probably</p> <p>9 be -- that's what I'm saying, when I was at work, if</p> <p>10 I was on my e-mail, you know, I would say, Hey,</p> <p>11 you're booked for blah, blah -- blah, blah flight at</p> <p>12 whatever time, but that was within my -- I can't</p> <p>13 access Delta.</p> <p>14 Q So you currently have no such</p> <p>15 communications.</p> <p>16 A No.</p> <p>17 Q All right. And you've looked for them,</p> <p>18 and can't find them.</p> <p>19 A Yeah, I -- yeah, I -- I don't -- we don't</p> <p>20 even -- to answer you honestly, we -- after I wasn't</p> <p>21 there, we don't even discuss nonrev. I mean I --</p> <p>22 yeah. Since I wasn't there, he's not -- he hasn't</p> <p>23 traveled nonrev.</p> <p>24 Q What I'm trying to understand is you have</p> <p>25 e-mails in your possession that reflect</p>
<p style="text-align: right;">Page 58</p> <p>1 pleasure, which I made that very clear.</p> <p>2 Q You knew the rule was you could only</p> <p>3 travel for pleasure. Yes?</p> <p>4 A Yes. I'm glad you asked me that. I was</p> <p>5 very clear that it was -- it's always -- when I</p> <p>6 booked, I always booked my people, it was always for</p> <p>7 pleasure. They --</p> <p>8 Q We're going to talk about that.</p> <p>9 A Oh, okay.</p> <p>10 Q I promise you.</p> <p>11 My question is, do you have in your</p> <p>12 possession any communications with Mr. Dais about</p> <p>13 travel that you booked for him during the time that</p> <p>14 you were employed at Delta?</p> <p>15 A Just when I was there. I guess like -- I</p> <p>16 understand what you're asking me. I'm trying to</p> <p>17 answer the question effectively and honestly for</p> <p>18 you.</p> <p>19 Yes. I communicated with him when I was</p> <p>20 there about the nonrev travel.</p> <p>21 Q Do you have any of those communications?</p> <p>22 Do you have any e-mails? Do you have any texts?</p> <p>23 A Oh, no, none that -- none that I can --</p> <p>24 not now. I don't think I have anything -- there's</p> <p>25 no -- I've changed phones. He's changed -- like I</p>	<p style="text-align: right;">Page 60</p> <p>1 communication with Mr. Dais, for example; correct?</p> <p>2 A Yes, when I was working there.</p> <p>3 Q Okay.</p> <p>4 A If you're talking about old stuff like</p> <p>5 when I booked him a flight. Is that what you're</p> <p>6 saying? I mean if I go back to, I guess, when I</p> <p>7 first started, it may be an e-mail that shows,</p> <p>8 Hey -- where he flew from here to here. But that</p> <p>9 was like way before any of this.</p> <p>10 And, to my understanding, when the stuff</p> <p>11 kind of occurred, it was like -- what I was told in</p> <p>12 a meeting that I wasn't -- didn't have no knowledge</p> <p>13 of, it was -- I don't -- they didn't want anything</p> <p>14 from that far back. So that's why I'm not</p> <p>15 understanding. It was like, no, we don't -- don't</p> <p>16 worry about the stuff from '07, '08. They didn't</p> <p>17 want that. So I'm not understanding.</p> <p>18 Q Ms. Stevenson, I'm not -- I haven't asked</p> <p>19 you any of those questions.</p> <p>20 What I'm asking you is -- I'm trying to</p> <p>21 figure out what documents you currently have today</p> <p>22 in your possession.</p> <p>23 A Yeah, I -- that's what I'm saying. I</p> <p>24 don't -- you're saying nonrev. I guess where I'm</p> <p>25 getting confused, I don't work at Delta anymore, so</p>

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<p>Page 61</p> <p>1 I didn't keep any of me and his communication.</p> <p>2 Q All right. So there's none on your</p> <p>3 personal e-mail.</p> <p>4 A None that I know of, other than past stuff</p> <p>5 where I would book it, and it might have come back</p> <p>6 to me and say, Hey, you know, Mr. Dais is booked for</p> <p>7 whatever whatever.</p> <p>8 But usually, a lot of times, I would</p> <p>9 just -- you know, just -- how it's a part where you</p> <p>10 could send an e-mail, you know, send the person's</p> <p>11 reservation. And I sometimes would just send it to</p> <p>12 him, meaning I wouldn't even seen it to my own, even</p> <p>13 though I could. I just would send it to him and</p> <p>14 say, Here's your reservation.</p> <p>15 Q I haven't -- again, Ms. Stevenson, this --</p> <p>16 I promise you this is --</p> <p>17 A Maybe I'm not understanding.</p> <p>18 Q Yeah, this is going to go a lot faster.</p> <p>19 I'm asking a very simple question.</p> <p>20 A Uh-huh.</p> <p>21 Q I'm trying to figure out --</p> <p>22 A No. I don't have anything now.</p> <p>23 Q And have you looked in your personal</p> <p>24 e-mails to see if you do?</p> <p>25 A I haven't looked lately, but I looked back</p>	<p>Page 63</p> <p>1 I'll give you where I stay sometimes.</p> <p>2 Q Okay.</p> <p>3 A It's 1744 -- oh, gosh, I just went blank.</p> <p>4 1744 Cambridge Avenue. And that's Atlanta, 30337.</p> <p>5 Q All right.</p> <p>6 A Yeah.</p> <p>7 Q And who owns that place?</p> <p>8 A I don't know the owner. A friend of mine</p> <p>9 just -- it's their place, and they just kind of</p> <p>10 allow me to be there.</p> <p>11 Q Okay. So have you a friend who's leasing</p> <p>12 it?</p> <p>13 A Yes, yeah, they -- they lease it and --</p> <p>14 yeah. They know the owner or something. I don't</p> <p>15 know because, I'll be honest, I don't ask him their</p> <p>16 business. He just has allowed me to --</p> <p>17 Q Who's that friend?</p> <p>18 A Mark Brown.</p> <p>19 Q All right. When was the last time you had</p> <p>20 a permanent address?</p> <p>21 A About, what, four or five -- about four</p> <p>22 months ago. About four months ago. I can give you</p> <p>23 that address.</p> <p>24 Q What is that?</p> <p>25 A 211 Crestridge Drive. And that's Atlanta,</p>
<p>Page 62</p> <p>1 then. I didn't see anything.</p> <p>2 Q Back then, before you left Delta, that's</p> <p>3 when you last looked.</p> <p>4 A Yeah, or even right after I wasn't there.</p> <p>5 But I didn't -- like I said, there was nothing --</p> <p>6 nothing there. He didn't -- he couldn't fly -- we</p> <p>7 didn't fly anymore.</p> <p>8 Q Do you have any documents in your</p> <p>9 possession that relate to jobs that you've held</p> <p>10 since Delta? For example, pay stubs from those</p> <p>11 employers or --</p> <p>12 A Do I have pay stubs --</p> <p>13 Q (No response, indicating.)</p> <p>14 A -- from other jobs.</p> <p>15 Q (No response, indicating.)</p> <p>16 A I have -- well, now, now I do.</p> <p>17 Q Okay. And you've not given me those;</p> <p>18 correct?</p> <p>19 A Well, I'm newly -- like when you say --</p> <p>20 no, I haven't -- I haven't given -- given them to</p> <p>21 you.</p> <p>22 Q All right.</p> <p>23 A No. I didn't know if you needed those.</p> <p>24 Q All right. Give me your current address.</p> <p>25 A I'm kind of in between. I'm homeless, and</p>	<p>Page 64</p> <p>1 30344.</p> <p>2 Q Okay.</p> <p>3 A That's who was -- someone else's, but I</p> <p>4 was an occupant on there. They -- yeah.</p> <p>5 Q Okay. Were you leasing it, or you just</p> <p>6 were staying there for free?</p> <p>7 A I was evicted.</p> <p>8 Q Were you leasing it?</p> <p>9 A Yes.</p> <p>10 Q Okay.</p> <p>11 A Couldn't pay the rent.</p> <p>12 Q And who were you leasing it from?</p> <p>13 A The name of the place is called Landmark.</p> <p>14 Q Okay. All right. And how long were you</p> <p>15 there?</p> <p>16 A Just -- was it -- right at a year and --</p> <p>17 yeah, that last month was -- couldn't make the rent.</p> <p>18 Q All right. And why don't we go back one</p> <p>19 further.</p> <p>20 Where were you living before there?</p> <p>21 A That was when I was still working, 3871</p> <p>22 Red Wine, just like the color and the wine, Red Wine</p> <p>23 Road. And it's Atlanta, 30344.</p> <p>24 Q And how long were you there?</p> <p>25 A I think probably two or two and a half</p>

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1 years, probably almost maybe three, but two and a
 2 half is -- yeah.

3 Q And what's your date of birth?

4 A [REDACTED].

5 Q Okay. All right. You've mentioned that
 6 you changed cell phones. You told me that you
 7 changed cell phones since the time you were at
 8 Delta; is that correct?

9 A Yes. I've -- yeah. I don't have the same
 10 one, yeah, that I had when I was working there.

11 Q Do you have the same phone number?

12 A Yeah, yes. I've had the same number for
 13 probably 15 years.

14 Q All right. And what's your cell phone
 15 number?

16 A [REDACTED] 2878.

17 Q All right. And you told me you've never
 18 been married --

19 A No.

20 Q -- correct?

21 A No.

22 Q Do you have kids?

23 A Unfortunately, not yet.

24 Q Okay. And you've got a high school
 25 degree; correct?

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1 A Yes.

2 Q From Parker?

3 A Parker High School.

4 Q And you went -- you did some college at
 5 Stillman; correct?

6 A I graduated from Stillman. And I did
 7 college at University of Alabama, Roll Tide.

8 Q Okay.

9 A I did five years in undergrad.

10 Q Okay. What's your degree in?

11 A It actually is interdisciplinary in
 12 biology slash premed.

13 Q Okay. And I know you're fairly active on
 14 social media; correct?

15 A Uh-huh.

16 Q You're on Facebook?

17 A Yes.

18 Q And what's your user ID?

19 A It's just my name, Quaniah Stevenson. You
 20 can type in my name, and it's on there.

21 Q What about Instagram?

22 A I am on Instagram. Usually what I put on
 23 Instagram --

24 You need that?

25 Q Yes?

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1 A N-I-N-A, the number 9, L-U-C-K-Y.

2 Q Nina9Lucky?

3 A Yes.

4 Q All right. And are you on Snapchat?

5 A I'll be honest, I am on there, but I
 6 haven't been on there probably -- I don't know the
 7 last time. I don't even -- I don't use it. I set
 8 up an account. I think I've been on there once. I
 9 don't understand Snapchat. I leave that to the
 10 younger kids.

11 MR. STONE: Let's take a break for a few
 12 minutes.

13 (Brief break.)

14 (Exhibit 5 was marked for identification.)

15 BY MR. STONE:

16 Q Ms. Stevenson, you know you're still under
 17 oath; correct?

18 A Yes.

19 Q All right. You were hired by Delta in, if
 20 I'm right, August of 2007; correct?

21 A Actually, I was hired in May. But what
 22 they ended up doing, they hired me as seasonal, and
 23 then they changed us from seasonal to ready reserve.
 24 And changed all the people that started with me to
 25 August 1st.

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1 Q So you -- so your date of employment --

2 A '07.

3 (Comment by Reporter.)

4 (Discussion off the record.)

5 BY MR. STONE:

6 Q I put in front of you what's been marked
 7 as Exhibit No. 5.

8 You recognize that as your Delta
 9 employment application; correct?

10 A Yes.

11 Q All right. And if you would take a moment
 12 to look at Exhibit 5. But, in particular, I want to
 13 take you to page 4 of Exhibit No. 5.

14 A Okay.

15 Q All right. And on page 4 of Exhibit
 16 No. 5, you are reporting to Delta your job history
 17 for the last ten years; correct?

18 A Uh-huh.

19 Q You have to say yes.

20 A Oh, yes, I'm sorry.

21 Q All right. And I want to ask you, first
 22 of all, is that an accurate recount of your past
 23 employment history?

24 A Is it correct?

25 Q Yes.

<p style="text-align: right;">Page 69</p> <p>1 A This is not every job. But the ten-year</p> <p>2 period is accurate -- is accurate on what I worked</p> <p>3 during that time. I've worked other places. But</p> <p>4 that was accurate at the time.</p> <p>5 Q Let me make sure I understand what you're</p> <p>6 saying.</p> <p>7 If you look at page -- the last page of</p> <p>8 Exhibit 5, you'll see that you filled this</p> <p>9 application out on -- in April of 2007; correct?</p> <p>10 A Yes, sir.</p> <p>11 Q All right. And you will -- on your</p> <p>12 employment history section were listing your</p> <p>13 employers for the last ten years before April of</p> <p>14 2007; correct?</p> <p>15 A Uh-huh, uh-huh.</p> <p>16 Q You have to say yes or no.</p> <p>17 A Yes.</p> <p>18 Q All right. Is that a complete history of</p> <p>19 your employment for the ten years that precedes</p> <p>20 April of 2007?</p> <p>21 A Yes, that is accurate.</p> <p>22 Q So this is every place that you worked in</p> <p>23 the ten-year period before you applied to Delta.</p> <p>24 A Yes.</p> <p>25 Q All right.</p>	<p style="text-align: right;">Page 71</p> <p>1 A I did a complete history within the ten</p> <p>2 year, because all these years fell with what I had</p> <p>3 actually worked in that time period.</p> <p>4 Q Ms. Stevenson, that makes no sense.</p> <p>5 A I don't think that's a fair question.</p> <p>6 Q Did you work somewhere else between 1997</p> <p>7 and 2007 other than --</p> <p>8 A These are the places that I did work --</p> <p>9 Q Did you --</p> <p>10 A -- Mr. Stone.</p> <p>11 Q -- work anyplace else?</p> <p>12 A I did work other places, but that did not</p> <p>13 fall within this, to my understanding. I put</p> <p>14 everything that fell within that ten-year period.</p> <p>15 Q Between 1997 and 2007, where did you work,</p> <p>16 other than the four locations listed here?</p> <p>17 A Again, this is -- this is -- I put what</p> <p>18 was accurate at the time. I was very honest and</p> <p>19 clear at the time with what I put here.</p> <p>20 Q Ms. Stevenson, a moment ago I asked you,</p> <p>21 did you work anywhere else, other than these four</p> <p>22 locations, between 1997 and 2007, and you answered</p> <p>23 yes.</p> <p>24 A Yes, I said I did.</p> <p>25 Q Where else?</p>
<p style="text-align: right;">Page 70</p> <p>1 A It should be, yes.</p> <p>2 Q Well, it should be doesn't help me,</p> <p>3 Ms. Stevenson.</p> <p>4 Is it or is it not?</p> <p>5 A Yes.</p> <p>6 Q All right. So you didn't work anywhere</p> <p>7 else between 1997 and 2007 when you filled this</p> <p>8 application out.</p> <p>9 A As I stated, I put it within the years</p> <p>10 that I worked there. I said I have worked other</p> <p>11 places, I have.</p> <p>12 Q Between --</p> <p>13 A But that didn't apply to -- I don't think</p> <p>14 it applied to here, during the --</p> <p>15 Q Ms. Stevenson, listen to my question.</p> <p>16 A Uh-huh.</p> <p>17 Q Between 1997 and 2007, did you work</p> <p>18 anyplace other than the four employers listed on</p> <p>19 page 4 of Exhibit No. 5?</p> <p>20 A Yes, yes.</p> <p>21 Q So this is not a complete history of your</p> <p>22 employment between 1997 and 2007.</p> <p>23 A No, that's not a complete history.</p> <p>24 Q You see at the very top where it asks you</p> <p>25 to provide a complete history on Line 1?</p>	<p style="text-align: right;">Page 72</p> <p>1 A Oh, you just want to know where else I</p> <p>2 worked. Okay. I'm sorry. Because I don't -- okay.</p> <p>3 I've worked at Southwest before.</p> <p>4 Q When did you work at Southwest?</p> <p>5 A I do not know or remember -- that was so</p> <p>6 long ago. I don't -- I don't know.</p> <p>7 Q Was it between 1997 and 2007?</p> <p>8 A I don't -- I really don't -- I'm being --</p> <p>9 I don't remember that part.</p> <p>10 Q Where else --</p> <p>11 A I did work there.</p> <p>12 Q -- did you work between 1997 and 2007,</p> <p>13 other than the four locations listed on your</p> <p>14 employment application?</p> <p>15 A Greater Atlanta Women's Healthcare. That</p> <p>16 would be it. Those are the only two places.</p> <p>17 Q So other than the four locations on your</p> <p>18 employment application, Southwest and Greater</p> <p>19 Atlanta, there's nowhere else that you worked</p> <p>20 between '97 and 2007.</p> <p>21 A None that I can recall, no, not at this --</p> <p>22 this time.</p> <p>23 Q When did you work at Greater Atlanta</p> <p>24 Women's Center?</p> <p>25 A I do not know the -- the year, I don't.</p>

<p style="text-align: right;">Page 73</p> <p>1 Q Give me your best estimate.</p> <p>2 A It might have been before '97. It might</p> <p>3 have -- maybe a little bit before or right after.</p> <p>4 I'm not accurate on that.</p> <p>5 Q Okay. And give me your best estimate as</p> <p>6 to when you worked at Southwest.</p> <p>7 A It was maybe right around the time that I</p> <p>8 have the at home. But, again, I'm not accurate on</p> <p>9 that --</p> <p>10 Q Okay.</p> <p>11 A -- because I didn't -- I didn't stay long</p> <p>12 any -- myself anyway. I didn't -- I didn't want to</p> <p>13 work there. I resigned, so I -- I don't remember.</p> <p>14 Q So in -- so it was approximately '97</p> <p>15 or '98 when you worked at Southwest, same time you</p> <p>16 were working --</p> <p>17 A It might have been around that time.</p> <p>18 Again, I --</p> <p>19 Q All right. And you resigned from</p> <p>20 Southwest?</p> <p>21 A Uh-huh.</p> <p>22 Q Yes? You have to say yes or no.</p> <p>23 A Yes, I did.</p> <p>24 Q Did you do so under threat of termination?</p> <p>25 A Absolutely not. They did not want me to</p>	<p style="text-align: right;">Page 75</p> <p>1 decided -- at the time, I was thinking about -- I</p> <p>2 was torn between the airline industry or go be an ER</p> <p>3 doctor you know, or musician. It was a lot of</p> <p>4 things. I was younger. So I was just trying to</p> <p>5 figure out what I wanted to do then so --</p> <p>6 Q Did you leave --</p> <p>7 A -- I resigned. I just resigned. I just</p> <p>8 decided to -- I just decided to --</p> <p>9 Q Yeah. Did you have any discipline at</p> <p>10 Greater Atlanta Women's Center?</p> <p>11 A No, I did not.</p> <p>12 Q Did you resign because you had another</p> <p>13 job?</p> <p>14 A I did. Which job was it? I did. I left</p> <p>15 there, and I just got more into the things that I</p> <p>16 work -- was happier doing.</p> <p>17 Q What job did you have that you resigned</p> <p>18 for, Ms. Stevenson?</p> <p>19 A I -- to answer you honestly, I don't know</p> <p>20 what my transition was from there to here. Because,</p> <p>21 at that time in my life, I was searching. I was</p> <p>22 working promotional jobs. I was way younger. I was</p> <p>23 in my 20s, so I -- I was all over the place doing</p> <p>24 what 20 year olds do. So, I'll be honest, I just --</p> <p>25 I was working odd jobs, promo jobs. I was just</p>
<p style="text-align: right;">Page 74</p> <p>1 leave. I -- I did not -- I did not want to live</p> <p>2 where I was based to. I felt that I was in a very</p> <p>3 unsafe situation. So I just --</p> <p>4 Q Where were you living?</p> <p>5 A I resigned.</p> <p>6 I was in Chicago, and the neighborhood was</p> <p>7 just not safe, so I --</p> <p>8 Q And if I review your Southwest</p> <p>9 application --</p> <p>10 A I resigned.</p> <p>11 Q -- will it reflect --</p> <p>12 You've got to let me finish my question.</p> <p>13 A Uh-huh.</p> <p>14 Q If I review your Southwest application,</p> <p>15 will it reflect any discipline?</p> <p>16 A Absolutely not.</p> <p>17 Q And it will not reflect that you were</p> <p>18 under threat of termination.</p> <p>19 A It will absolutely not. It is a clear</p> <p>20 resign.</p> <p>21 Q Why did you leave the Greater Atlanta</p> <p>22 Women's Center?</p> <p>23 A Oh, better -- I just started getting</p> <p>24 better situations of more money and just trying to</p> <p>25 maneuver myself into better situations. And I</p>	<p style="text-align: right;">Page 76</p> <p>1 doing a lot of different things at that time.</p> <p>2 Q So you worked a lot of other jobs, other</p> <p>3 than these four.</p> <p>4 A No, no, no, it wasn't a lot of -- it was</p> <p>5 more so -- like I said, it was promo stuff. But I</p> <p>6 was all over the place, as far as I didn't know</p> <p>7 which way I wanted to go. So I can't say where I</p> <p>8 went after that. I just knew at that time I was no</p> <p>9 longer seeking to be a doctor. And I kind of had my</p> <p>10 eyes set on Delta. And I just kind of did whatever</p> <p>11 I needed to do until Delta was what was in my heart.</p> <p>12 And I -- that's what it was.</p> <p>13 Q Did you leave that job to take a job at</p> <p>14 Delta?</p> <p>15 A No. Where did I come from? I think I was</p> <p>16 doing -- what was I doing? I don't know what I was</p> <p>17 doing before that.</p> <p>18 Q You worked --</p> <p>19 A I was working in promos, office, an</p> <p>20 office. I was just doing something, an office type</p> <p>21 situation.</p> <p>22 Q Your job application reflects that from</p> <p>23 January of 1998 to May of 2002 you worked for</p> <p>24 Another Dais Productions; is that correct?</p> <p>25 A Yes.</p>

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<p style="text-align: right;">Page 77</p> <p>1 Q And that's a music production company 2 owned by Jovan Dais; correct? 3 A Yes. 4 Q And Mr. Dais was your boyfriend; correct? 5 A Uh-huh. 6 Q You have to say yes. 7 A Oh, I'm sorry, yes. 8 Q All right. And your application reflects, 9 you'll see on the far right-hand side, that you -- 10 at the time you were applying for Delta you were 11 still doing occasional work for Another Dais? 12 A Yeah, yeah, I think. 13 Q And how long did you continue doing 14 occasional work for Another Dais Productions? 15 A That was ongoing, because that was my 16 significant person. 17 Q So that was throughout your employment at 18 Delta? 19 A Yeah. Well, not throughout my employment. 20 Because as we got more serious, I didn't have to 21 necessarily -- you know, the work just went to 22 another person so -- 23 Q When did you stop doing work for Another 24 Dais Productions, if ever? 25 A I never -- at that point, if I'm at Delta,</p>	<p style="text-align: right;">Page 79</p> <p>1 A We started dating '01, the end of '01. 2 The reason I know that is because -- yeah. 3 Q And when did you stop dating? 4 A We still talk, but we're not -- you know, 5 we still -- 6 Q When did you stop dating? When did you 7 stop having a romantic relationship with him? 8 A We still talk though. 9 Q When did you stop a romantic relationship 10 with him? 11 A It's been ongoing. I mean -- 12 Q So he's still your boyfriend. 13 A We still talk, but I -- you know, I -- 14 that's kind of -- we date every now and then. 15 Q Okay. 16 A But there is not a, you know -- 17 Q You're still dating Mr. Dais. 18 A We still see each other from time to time. 19 Q Okay. But you are not -- 20 A We don't have any -- 21 Q You're not in any -- 22 A Yes, we're not the way we were. 23 Q When did you stop being the way you were? 24 A Maybe really, really like that -- I don't 25 know. Maybe about a year, a year ago.</p>
<p style="text-align: right;">Page 78</p> <p>1 and he was my boyfriend, I wasn't -- I don't know 2 what year. I just -- it just went more personal. I 3 didn't -- there was no -- I wasn't -- I don't know a 4 year to say, hey, it was this year when I stopped. 5 Q Give me your best estimate. We know it 6 was after 2007; correct? 7 A Yeah. I mean -- yeah, exactly. I mean -- 8 I don't know. '08 or -- '08. You could say '08, I 9 guess. 10 Q Well, you tell -- 11 A He was my boyfriend so -- 12 Q It's your testimony. 13 How long did you continue to do occasional 14 work, to the best of your recollection? 15 A Oh, I don't think I was working anymore 16 when he was my boyfriend, so I -- I just wasn't 17 around it, if that -- I was around it. 18 Q What years was Mr. Dais your boyfriend? 19 A Oh, gosh, probably -- am I supposed to 20 answer -- I'm saying is that -- do I -- I'm saying 21 is that personal? I mean I don't -- I've never done 22 a deposition, so I don't know. Am I supposed to 23 answer that? 24 Q You need to answer my questions, 25 Ms. Stevenson.</p>	<p style="text-align: right;">Page 80</p> <p>1 Q Okay. 2 A Maybe about a year ago, yeah. It wasn't 3 that serious. 4 Q Okay. And am I correct that Another Dais 5 Productions where you worked is a music production 6 company? 7 A I don't want to speak, I guess, for him. 8 I'm trying -- yeah, they -- music production, 9 management, production management. 10 Q And it focuses on the rap music world? 11 A Actually a variety. It's not just rap. 12 It's a variety. 13 Q Is the company owned solely by Mr. Dais? 14 A Yes. 15 Q All right. And how long has he had the 16 company? 17 A To answer accurately, I've never asked 18 him. I just know that he's -- yeah, many years. I 19 definitely would say more than ten years. 20 Q Did he have it when you guys started 21 dating in 2001? 22 A Yes, yeah, his company, yeah. 23 Q All right. And when you were working for 24 Another Dais Productions, what were you doing for 25 them?</p>

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<p>Page 81</p> <p>1 A I was -- I was the -- actually, it was</p> <p>2 two -- I actually -- I'm a vocalist so I did a lot</p> <p>3 of background recording, some touring. And I did --</p> <p>4 I got moved into -- they thought I would be better</p> <p>5 at what I'm really good at, which is the marketing</p> <p>6 department and promotions. So I used to like</p> <p>7 advertise. And I was really good with branding.</p> <p>8 Q Okay. Do you -- Mr. Dais is still</p> <p>9 operating his production company; correct?</p> <p>10 A Yes, sir.</p> <p>11 Q And does he have employees?</p> <p>12 A Yes, yes, yeah, I guess it would be</p> <p>13 artists you would call the people that he works</p> <p>14 with. He does.</p> <p>15 Q Are you doing work for them now?</p> <p>16 A No, I'm not, I'm not.</p> <p>17 Q When was the last time you did work for</p> <p>18 them?</p> <p>19 A Well, like I said, I really haven't in</p> <p>20 years, because we were -- we just kind of friends,</p> <p>21 so I don't --</p> <p>22 Q How many employees does Mr. Dais have?</p> <p>23 A I could ask him. I do not know because</p> <p>24 that -- that business fluctuates.</p> <p>25 Q Do you know if he has more than five</p>	<p>Page 83</p> <p>1 A B-R-A-T-T-O-N.</p> <p>2 Q All right. Who else?</p> <p>3 A Rodney Turner. He's one of the management</p> <p>4 people. Who else? Asia, but I don't know her last</p> <p>5 name. I just know that they -- this girl does a lot</p> <p>6 of work for him. Her first name definitely is Asia,</p> <p>7 as in A-S-I-A, yeah, Asia. Who else? Oh, Moore,</p> <p>8 Marquis Moore. That's one of his -- he's been there</p> <p>9 for years, Marquis Moore, just like it sounds. I</p> <p>10 can't think of anybody else I know over there.</p> <p>11 Q All right. Looking at your employment</p> <p>12 application again at page 4, it looks like you were</p> <p>13 working at a place called Castle Rock at the time</p> <p>14 you applied for Delta; is that right?</p> <p>15 A Oh, yes, yes, yes.</p> <p>16 Q What did you do for Castle Rock?</p> <p>17 A It was -- he's a developer around -- a</p> <p>18 developer, a builder. And so, basically, it was</p> <p>19 same thing. He had me doing -- I'm really good at</p> <p>20 branding, marketing, advertising, promo.</p> <p>21 And, also, like when he would sell houses</p> <p>22 or his property, he would -- like if you closed on</p> <p>23 something or whatever, I'd get a -- he'd work out --</p> <p>24 I'd get a percentage or something. If he closed on</p> <p>25 the situation, I would get something for helping him</p>
<p>Page 82</p> <p>1 employees?</p> <p>2 A He might have five to eight. And then it</p> <p>3 could fluctuate, and he may have three.</p> <p>4 Q Does Mr. Dais have any business other than</p> <p>5 his Another Dais Productions business?</p> <p>6 A What other businesses does he have? None</p> <p>7 that -- what else -- well, I mean I know he -- he's</p> <p>8 carpentry, he's a builder. I mean I don't know any</p> <p>9 name or anything. I've never asked him. But I know</p> <p>10 he knows how to build, like build stuff.</p> <p>11 Q Has he ever been in business as a</p> <p>12 carpenter?</p> <p>13 A No, that part I do know, no.</p> <p>14 Q All right. Do you know anybody who is</p> <p>15 currently working for Mr. Dais?</p> <p>16 A No.</p> <p>17 Q Do you know anybody who has ever worked</p> <p>18 for Mr. Dais?</p> <p>19 A Yeah. I mean I know -- we have a couple</p> <p>20 of mutual friends that I know that has worked in</p> <p>21 partner with him.</p> <p>22 Q Who are those?</p> <p>23 A Dunn Bratton, a guy named Dunn Bratton has</p> <p>24 worked for him before.</p> <p>25 Q Spell Bratton?</p>	<p>Page 84</p> <p>1 out, helping him close the deal or whatever. I</p> <p>2 guess that's what you would call it.</p> <p>3 Q Were you working for him on a salary</p> <p>4 basis? Were you working for him on a project basis?</p> <p>5 A Kind of a little bit of both. It was kind</p> <p>6 of like a little bit of both.</p> <p>7 Q Okay. All right. Media Star, what was</p> <p>8 Media Star?</p> <p>9 A Same thing, branding, marketing and</p> <p>10 promotion.</p> <p>11 Q What kind of company is Media Star?</p> <p>12 A Media Star, basically they were over a lot</p> <p>13 of the club life in Atlanta. At the time, Atlanta</p> <p>14 was like a hot, hot spot. So it was a lot of</p> <p>15 promotions for liquor, cigarettes, both of the</p> <p>16 things that I never have -- do. But it was liquor.</p> <p>17 It was cigarette branding. It was club party promos</p> <p>18 for a lot of the hot celebrities at that time.</p> <p>19 Q Do you -- was Media Star, was that a</p> <p>20 full-time job or was that a part-time job?</p> <p>21 A It was kind of part time. But as much as</p> <p>22 I worked, I really want to say full time. Part</p> <p>23 time. You can say part time.</p> <p>24 Q How many hours a week were you working?</p> <p>25 A It was kind of like a Thursday -- a</p>

<p style="text-align: right;">Page 85</p> <p>1 Thursday through Sunday. Those were the hot nights.</p> <p>2 Thursday, Friday, Saturday, maybe Sunday, depending</p> <p>3 on the celebrities, Lil' Kim or somebody, Jay-Z come</p> <p>4 through, yeah.</p> <p>5 Q How many hours a week were you working?</p> <p>6 A Probably -- I think I remember my checks</p> <p>7 being like -- they ran from 30 to 32 maybe.</p> <p>8 Q What about for Castle Rock; was that a</p> <p>9 full-time or part-time job?</p> <p>10 A That was really just kind of -- it was</p> <p>11 full time. But he's the owner, so he would -- like</p> <p>12 this is the -- like this isn't like a -- he made</p> <p>13 the -- it's like what -- he made the decision. So</p> <p>14 it was like him and his partner, like they owned</p> <p>15 everything so --</p> <p>16 Q Was it a full-time or part-time job?</p> <p>17 A At the time it was more full time. It was</p> <p>18 more full -- because he had me doing a lot of stuff.</p> <p>19 Q How many hours a week were you working?</p> <p>20 A 32 maybe, yeah, 32.</p> <p>21 Q And tell me, again, how he paid you.</p> <p>22 A He would -- cash.</p> <p>23 Q Paid you cash under the table?</p> <p>24 A Yeah. He would give me cash, yeah.</p> <p>25 Q How much total did you make from him; do</p>	<p style="text-align: right;">Page 87</p> <p>1 termination as July 29, 2015.</p> <p>2 Was that --</p> <p>3 A It was actually July 28th.</p> <p>4 Q All right. So you, I take it, were</p> <p>5 generally familiar, because you were at Delta for a</p> <p>6 number of years, with Delta's policies; correct?</p> <p>7 A Uh-huh.</p> <p>8 Q You have to say yes or no.</p> <p>9 A Yes.</p> <p>10 (Exhibit 6 was marked for identification.)</p> <p>11 BY MR. STONE:</p> <p>12 Q You are familiar with what I've shown as</p> <p>13 Exhibit No. 6, which is, The Way We Fly at Delta;</p> <p>14 correct?</p> <p>15 A That was so long ago when I started.</p> <p>16 Q Sure. Take your time.</p> <p>17 A Is this what they gave me? I'll be</p> <p>18 accurate. I don't -- well, if this is the one that</p> <p>19 I had when I started, then it should be. I just</p> <p>20 know they made a lot of changes. I still have a lot</p> <p>21 of close friends there. So I don't know if they</p> <p>22 changed anything because I didn't ask but --</p> <p>23 Q As you look at Exhibit No. 6, it looks</p> <p>24 generally familiar as Delta's policies, correct, The</p> <p>25 Way We Fly?</p>
<p style="text-align: right;">Page 86</p> <p>1 you know?</p> <p>2 A For the year?</p> <p>3 Q (No response, indicating.)</p> <p>4 A Maybe right at what I put there or</p> <p>5 sometimes a little less, depending on his mood.</p> <p>6 Q Okay.</p> <p>7 A He was -- he was the head -- he was the</p> <p>8 CEO. So in account of what he said went.</p> <p>9 Q So let's go back to Delta for -- your</p> <p>10 Delta employment for a moment.</p> <p>11 You said you got hired as seasonal, ready</p> <p>12 reserve in May and then --</p> <p>13 A Seasonal went from May to -- yeah, to</p> <p>14 July. And then they had started sending us letters</p> <p>15 and calling us in. Hey, you want to -- do you want</p> <p>16 to move into something else? Of course I did. And,</p> <p>17 I'm sorry, I get really giddy when I talk about it.</p> <p>18 That was a good time for me because -- yeah. And I</p> <p>19 wanted to be full time with Delta, so yeah.</p> <p>20 Q And you were at Delta, you said, for a</p> <p>21 number of years; correct?</p> <p>22 A Yes.</p> <p>23 Q Through 2015; correct?</p> <p>24 A Yes.</p> <p>25 Q All right. I have your date of</p>	<p style="text-align: right;">Page 88</p> <p>1 A Uh-huh.</p> <p>2 Q Yes?</p> <p>3 A Uh-huh.</p> <p>4 Q You have to say yes or no.</p> <p>5 A Oh, yes, I'm sorry.</p> <p>6 Q Okay. Fair enough.</p> <p>7 And, in any event, you knew how to access</p> <p>8 Delta's policies online, if you needed to get to</p> <p>9 them; correct?</p> <p>10 A Uh-huh. Yes, sir.</p> <p>11 Q Okay.</p> <p>12 A Yes, sir.</p> <p>13 Q All right. You knew, for example, if you</p> <p>14 turn to page 10 of Exhibit No. 6 -- I'm sorry.</p> <p>15 A Here?</p> <p>16 Q Yes, page 10.</p> <p>17 You knew that Delta had a professionalism</p> <p>18 and respect policy --</p> <p>19 A Oh, 10.</p> <p>20 Q -- correct?</p> <p>21 A I'm on 6. I'm sorry.</p> <p>22 Yes. Okay. Now what now?</p> <p>23 Q That Delta had a professionalism and</p> <p>24 respect policy.</p> <p>25 A Yes.</p>

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<p style="text-align: right;">Page 89</p> <p>1 Q You were aware of that; correct? And --</p> <p>2 A Yes.</p> <p>3 Q All right. And you were aware on page 11</p> <p>4 they had an open door policy; correct? That was</p> <p>5 well known at Delta?</p> <p>6 A Yes.</p> <p>7 Q All right. And you were aware, for</p> <p>8 example, that Delta, on page 13, had policies on,</p> <p>9 for example, accommodation; correct?</p> <p>10 A Yes.</p> <p>11 Q All right. And my understanding is is</p> <p>12 that you, on occasion -- on occasion requested an</p> <p>13 accommodation at Delta; correct?</p> <p>14 A Per the advisement of my performance</p> <p>15 leader Carole --</p> <p>16 Q Carole Kerr?</p> <p>17 A -- Kerr at the time.</p> <p>18 Q Sure.</p> <p>19 A I did not -- at that time, I was going</p> <p>20 through so much I had gotten a --</p> <p>21 Oh, yeah, I remember. I do remember this.</p> <p>22 (Exhibit 7 was marked for identification.)</p> <p>23 BY MR. STONE:</p> <p>24 Q I just showed you Exhibit No. 7. That's</p> <p>25 your accommodation request; correct?</p>	<p style="text-align: right;">Page 91</p> <p>1 A Oh, yes, yes. Okay. Yeah. Okay. I</p> <p>2 didn't -- yeah. Okay. I see I put that, in the</p> <p>3 words of Carole. Okay. I didn't put her last name</p> <p>4 down.</p> <p>5 Q All right. And you received the e-mail,</p> <p>6 at the top of Exhibit No. 6, back in response to</p> <p>7 your accommodation request; is that right?</p> <p>8 A Oh, this right here?</p> <p>9 Q Yes.</p> <p>10 A Is this per Kiha?</p> <p>11 Q Yes.</p> <p>12 A Uh-huh.</p> <p>13 Q That was the response you received back;</p> <p>14 correct?</p> <p>15 A Uh-huh.</p> <p>16 Q Yes?</p> <p>17 A Yes.</p> <p>18 Q And you were -- if I'm correct, you were</p> <p>19 seeking a schedule change as an accommodation, a</p> <p>20 less than 30 days schedule change, which is why Kiha</p> <p>21 sent you that e-mail back at the top of Exhibit 6;</p> <p>22 correct?</p> <p>23 A Uh-huh.</p> <p>24 Q Yes?</p> <p>25 A Yes. I was seeking two things at the</p>
<p style="text-align: right;">Page 90</p> <p>1 A Yeah. That's why I said, per the request</p> <p>2 of my -- yeah, my performance leader at the time.</p> <p>3 Because I had not at that time -- because this is</p> <p>4 immediate. I didn't -- I didn't know about this. I</p> <p>5 didn't remember.</p> <p>6 So after I lost -- had a significant</p> <p>7 family death, had went in and talked. And it was,</p> <p>8 Hey, you need to go see such and such. I'll tell</p> <p>9 you what you need to say, which is dah, dah. You</p> <p>10 need to get -- and ask for accommodation because,</p> <p>11 you know, I see you going through a lot, which is</p> <p>12 what I did.</p> <p>13 Q And you were having some car problems too,</p> <p>14 it looks like as well, on top of that; correct?</p> <p>15 A I was having -- can I --</p> <p>16 Q Yeah, please do. You can start -- I'm</p> <p>17 really going to focus on that and that part of</p> <p>18 Exhibit No. 7.</p> <p>19 A Oh, she asked me if I was there. Uh-huh.</p> <p>20 Q Yes?</p> <p>21 A Yes, sir.</p> <p>22 Q That was your -- that's your accommodation</p> <p>23 request that you made at Delta; correct?</p> <p>24 A Uh-huh.</p> <p>25 Q You have to say yes.</p>	<p style="text-align: right;">Page 92</p> <p>1 time. I was seeking the schedule change.</p> <p>2 But I also, Ben, was trying to -- I had</p> <p>3 also seeked -- and I'm pretty sure Sheandra knows</p> <p>4 about this, how you can -- I was seeking a lateral</p> <p>5 move as well. I don't know if that's later on. But</p> <p>6 I was seeking a lateral move of which to get off of</p> <p>7 International because I knew of everything -- you</p> <p>8 know, how much more stressful International was</p> <p>9 because you just deal with more there with the</p> <p>10 passports and everything.</p> <p>11 So I was seeing a lateral move to go back</p> <p>12 to Domestic for a slower pace. And I actually was</p> <p>13 granted that -- that lateral move -- I was granted</p> <p>14 the lateral move. Everybody started coming</p> <p>15 congratulating me. My name was there. And then</p> <p>16 maybe roughly about ten days, nine days later, I was</p> <p>17 told that it had gotten awarded to someone else. I</p> <p>18 forgot the male counterpart's name. I could get his</p> <p>19 name. I know -- but it was given to someone else.</p> <p>20 And then I was told it wasn't supposed to</p> <p>21 have been taken from me. I didn't make a fuss about</p> <p>22 it then. I just said, okay, I'll stay where I was,</p> <p>23 once I had got the call that I was to stay where I</p> <p>24 was at. And then soon after all of the other little</p> <p>25 stuff kind of started coming and everything else.</p>

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1 Q Let me make sure I understand what you're
2 saying.
3 So in this e-mail, it looks like we're
4 talking about your request for a shift change;
5 correct?
6 A Well, it was --
7 Q Temporary, 30 days.
8 A Yeah, it was kind of -- yeah, yeah, yeah,
9 a shift change more so for, you know, later time and
10 account of the -- yeah, shift change.
11 Q To address your car situation; correct?
12 A Yes, just -- that and along with I was
13 dealing with grief.
14 Q Because your mother had died --
15 A No.
16 Q -- or was sick?
17 A It was actually -- it was my aunt that had
18 died. But my mother was kind of going through some
19 things as well, some stuff I had talked over with
20 Carole, and I -- they had referred me -- let me see.
21 I had got --
22 Q Well, let me stop you there.
23 A Oh, okay.
24 Q But you got that shift change is what I
25 was trying to ask. They granted you the shift

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1 change, according to your complaint; correct?
2 A Yeah. Well, they didn't actually grant
3 the -- necessarily the shift change. I wasn't
4 necessarily granted that. It was just more so I
5 talked it over with Carole at the -- you know, at
6 the time.
7 And it was understood that normal -- the
8 normal time that in the system that it showed that I
9 would have normally -- people would have -- you
10 would have seen me in the briefing, you wouldn't
11 have necessarily saw me because I was kind of
12 allowed to come in, with everything I had going on,
13 during the later time, which I always made sure that
14 I was there. And I still maintained that, as well
15 as working for other people at that time.
16 Q But they took care of that situation for
17 you; correct?
18 A Yes.
19 Q All right. And then let's talk about this
20 transfer to International.
21 A Well, Domestic.
22 Q I'm sorry, transfer to Domestic.
23 When did you make that request; do you
24 recall?
25 A I'll be honest, I don't remember the exact

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1 time that I did it. But it would have -- it would
2 have fallen right around like when -- like the every
3 six month thing that we get to do.
4 Q Do you remember if it was 2014, 2015,
5 remember the year even, or you can't remember?
6 A It might have been -- it might have
7 been --
8 Q 2015?
9 A -- right around 2015. No, it might have
10 been 2014 --
11 Q Right.
12 A -- right around in there where I was
13 trying to get off of -- like I said, trying to get
14 off of International. It might have -- I'll be
15 accurate, I don't -- it might have been 2014. But I
16 was trying to get off of International.
17 Because I knew just when I had worked at
18 Domestic, when we're waiting to get badges, the pace
19 of it was -- I knew it would work better for my
20 mental state and everything else. So that's why I
21 went to do the lateral move and try to get it. I
22 was awarded it, and then it was taken right -- taken
23 back from me.
24 Q And you don't know why it was taken back
25 from you?

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1 A I was told someone else had put in before
2 me -- and, again, this is just speculation. I'm
3 just telling you what I was told. That someone had
4 put in before me that were more senior to me, and
5 that's why it was taken from me.
6 But then -- then I was told I was -- that
7 I should have been allowed to still make the lateral
8 move, because of the time gap that I was told was
9 not -- didn't fall in within the compliance of like,
10 well, if you weren't told that within the three to
11 five days, and now you're getting a call like almost
12 two weeks later, that just isn't right.
13 And then it was just the male counterpart
14 that it was given to got the situation, complained
15 to some of my fellow coworkers and was actually then
16 upset about -- was upset about me getting awarded
17 the position over him.
18 And everybody in my department at that
19 particular time knew. And they were like, Oh, he
20 pitched a fit about it. They kind of just --
21 certain people just kind of was -- people talk.
22 They just --
23 Q The person was upset because he had more
24 seniority and --
25 A Yeah.

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1 Q I got it.

2 A And she shouldn't get it, and it became a

3 big mess and --

4 Q And Delta concluded it was a mistake

5 because he had more seniority, and so they gave it

6 to him instead of you; correct?

7 A Yeah, so that's what they -- that's what

8 they were saying at the time that's what happened.

9 Then he ended up per coworker people then

10 got there and complained more and was still upset.

11 And then didn't want to even be there when I wanted

12 to be there and would have been happy with it.

13 Q All right. When you -- how did you seek

14 this position? Did you bid for it?

15 A I bid, yes.

16 Q So you weren't seeking it through the

17 accommodation process. You just bid for it.

18 A I bid for that one.

19 And like what -- the way -- I'm sure

20 Sheandra knows, like the way the system goes, which

21 is one of the supervisors at the time had told me at

22 the time, or one of the coworker people, were saying

23 that, to my knowledge, once we get awarded, you

24 know, through the system, other than, like you say,

25 going and seek accommodations, they'll tell you --

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1 and I've heard it before myself.

2 It's like you can't go then and say, well,

3 hey, the system gave me a 3:00 to 11:00. I don't

4 want that. The supervisor is going to look at you

5 like you're crazy and say no.

6 Q Okay. I understand what you're saying.

7 To be clear, you bid for that position.

8 A I did.

9 Q The accommodation you sought, however, was

10 Exhibit 7.

11 A Yes, sir.

12 Q And you sought it because your aunt had

13 been sick --

14 A And my mom --

15 Q -- and because of your car.

16 A And the car. Yeah, it was just a lot.

17 Everything happened at one time.

18 Q I'm with you.

19 Any other reason you sought it, or those

20 are the reasons?

21 A That. I was heavily depressed. It was

22 just a lot going on, Ben, to answer you honestly.

23 Depression. My mom was going through some stuff.

24 What I know I'm dealing with with her, even to this

25 day.

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1 Q Okay. And they -- and we've already

2 talked about how they dealt with your shift issue;

3 correct?

4 A Yes, sir.

5 Q Okay. You told me a moment ago -- we're

6 going to -- we were talking -- when we took that

7 detour, we were talking about Delta policies. And

8 you told me a moment ago you were familiar with some

9 of the policies we've looked at already.

10 And I take it you are also familiar with

11 Delta's travel pass policies; correct?

12 A Yes, sir, absolutely.

13 (Exhibit 8 was marked for identification.)

14 BY MR. STONE:

15 Q Let me show you what's been marked as

16 Exhibit 8, and ask if you recognize those as Delta's

17 travel pass policies.

18 A Yes. I'm sure I am very familiar with

19 these, yeah. Yes, sir.

20 Q All right. Just because you and I live in

21 the airport world, I'm going to ask you a couple of

22 questions that seem obvious, but just for people who

23 don't live in the airline world necessarily.

24 Delta provides, as a benefit to its

25 employees, free and reduced rate travel; correct?

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1 A Yes, sir.

2 Q And it's provided not only to employees,

3 but also to, for example, travel companions of

4 employees; correct?

5 A Yes, sir.

6 Q So if it's your spouse, you can take your

7 spouse on a free flight; correct?

8 A Yes, sir.

9 Q All right. And if you don't have a

10 spouse, you can designate somebody as your travel

11 companion.

12 A Yes, sir.

13 Q Who also is entitled to free flights on

14 Delta; correct?

15 A The companion is discounted.

16 Q So if you designate -- you get reduced

17 rate travel; correct?

18 A Yes, sir.

19 Q And Delta also provides something called

20 buddy passes; correct?

21 A Yes, sir.

22 Q And those are passes you can give to

23 people.

24 A Family, friends.

25 Q Correct. All of this, of course, is for

<p style="text-align: right;">Page 101</p> <p>1 pleasure travel, not for business travel; correct?</p> <p>2 A Yes, sir.</p> <p>3 Q And that's a hard and fast rule at Delta,</p> <p>4 isn't it?</p> <p>5 A That is a strict rule.</p> <p>6 Q Exactly.</p> <p>7 A I get it. I know it.</p> <p>8 Q Yep. I get it. Good.</p> <p>9 You are, of course, responsible for making</p> <p>10 sure that you comply with your -- the rules related</p> <p>11 to travel passes; correct?</p> <p>12 A Yes, sir.</p> <p>13 Q Not only for yourself, but for your travel</p> <p>14 companions as well; correct?</p> <p>15 A Yes, sir.</p> <p>16 Q And Delta, of course, had other rules and</p> <p>17 policies that were available on DeltaNet that you</p> <p>18 could access during your employment; correct?</p> <p>19 A Yes, sir.</p> <p>20 Q You don't have access to those now,</p> <p>21 because you've left employment. But at the time you</p> <p>22 had them; correct?</p> <p>23 A I did, yes, sir.</p> <p>24 Q All right. Let's talk about your job</p> <p>25 duties and responsibilities for a second while you</p>	<p style="text-align: right;">Page 103</p> <p>1 A Yes. Love it.</p> <p>2 Q Okay. And you remained as a customer</p> <p>3 service agent your entire career at Delta; correct?</p> <p>4 A Yes, just -- I just was -- I've been in a</p> <p>5 lot of different departments at Delta, Sky Club,</p> <p>6 baggage claim. I never should have left baggage</p> <p>7 claim. That's where I was really thriving. But,</p> <p>8 yeah, baggage -- I started on the gates. And then I</p> <p>9 got to work.</p> <p>10 And a month later my PL -- they called</p> <p>11 them PLs at the time. My PL told me, Hey, you've</p> <p>12 been switched, you're going to baggage.</p> <p>13 Everybody was like, No, you don't want to</p> <p>14 go to baggage.</p> <p>15 And I was like, Why?</p> <p>16 You're not going to like it.</p> <p>17 Got there, loved it. I was in baggage for</p> <p>18 like four years, three and a half years. And then</p> <p>19 ended up -- one of my supervisors -- Sky Club came</p> <p>20 up. I wanted to learn ticketing. So ended up in</p> <p>21 the Sky Club. Loved, loved it.</p> <p>22 And the only reason I got out of the Sky</p> <p>23 Club is because at the time they didn't offer full</p> <p>24 time. So I bidded out and went to -- back to</p> <p>25 ticketing so I could learn more ticketing. So,</p>
<p style="text-align: right;">Page 102</p> <p>1 were employed at Delta.</p> <p>2 You were an airport -- in the airport</p> <p>3 customer service division; correct?</p> <p>4 A Yes, ACS125, unless they've changed the</p> <p>5 number.</p> <p>6 Q I don't believe they have changed the</p> <p>7 number.</p> <p>8 And 125 is what people call above the</p> <p>9 wings service; correct.</p> <p>10 A Above wing, yes, absolutely.</p> <p>11 Q And that means basically you're working in</p> <p>12 the airport; correct?</p> <p>13 A Yes.</p> <p>14 Q And, typically, you're working -- I know</p> <p>15 there's some other assignments. But, typically,</p> <p>16 you're working either at the ticket counter or at</p> <p>17 the gates; correct?</p> <p>18 A Yes, or arrivals.</p> <p>19 Q Arrivals. You might be working arrivals</p> <p>20 as well. Fair enough.</p> <p>21 You worked at the Atlanta airport;</p> <p>22 correct?</p> <p>23 A Yes, sir.</p> <p>24 Q And that was true during your entire</p> <p>25 career at Delta; correct?</p>	<p style="text-align: right;">Page 104</p> <p>1 yeah, gates, baggage, Sky Club, yeah.</p> <p>2 Q Worked lots of different areas at the</p> <p>3 airport.</p> <p>4 A I worked in lots of different areas.</p> <p>5 Q And your performance was good; correct?</p> <p>6 A Yes.</p> <p>7 Q Was there, from your perspective, any</p> <p>8 aspect of the job that you did not perform in a</p> <p>9 satisfactory fashion?</p> <p>10 A No. When I performed my job, I did my job</p> <p>11 above and beyond.</p> <p>12 Q And you were able to do everything that</p> <p>13 Delta required of you to Delta's full satisfaction.</p> <p>14 A I was.</p> <p>15 Q All right. I recognize, of course, there</p> <p>16 were times, including after the time you were hurt,</p> <p>17 where you had to take some time off; correct?</p> <p>18 A Uh-huh.</p> <p>19 Q Yes?</p> <p>20 A Oh, yes, sorry.</p> <p>21 Q And you took some disability leave during</p> <p>22 time that Delta granted you; correct?</p> <p>23 A Yes. I paid, and they were real clear.</p> <p>24 I'm actually glad I did that because -- yeah.</p> <p>25 Q You got paid during that time.</p>

<p style="text-align: right;">Page 105</p> <p>1 A Long term, short term. I made sure I</p> <p>2 always had that deducted from my check.</p> <p>3 Q Yeah. So you, during the time you took</p> <p>4 disability leave after your -- after the bag fell on</p> <p>5 you, you received first short-term and then</p> <p>6 long-term disability payments; correct?</p> <p>7 A The long term kicked in after a certain</p> <p>8 point, yes, sir.</p> <p>9 Q But other than the time when you were</p> <p>10 absent, either for that reason or because you had</p> <p>11 the flu or your car broke down or something like</p> <p>12 that, when you were at work you were able to do</p> <p>13 everything that Delta required to Delta's</p> <p>14 satisfaction; correct?</p> <p>15 A Yes, yes, I did.</p> <p>16 Q Okay. And you -- as a customer service</p> <p>17 agent, you would have reported to a supervisor;</p> <p>18 correct?</p> <p>19 A Uh-huh.</p> <p>20 Q You have to say yes.</p> <p>21 A Yes, sir. Yes, sir.</p> <p>22 Q All right.</p> <p>23 A Yes, sir.</p> <p>24 Q Sometimes they call them team leaders</p> <p>25 during the time; correct?</p>	<p style="text-align: right;">Page 107</p> <p>1 BY MR. STONE:</p> <p>2 Q And you told me a moment ago, Ms. Kerr, we</p> <p>3 talked about her, she was the one who suggested --</p> <p>4 A Go talk to Kiha, but yeah.</p> <p>5 Q To go get an accommodation; correct?</p> <p>6 A Yeah, yes.</p> <p>7 Q All right. Do you remember when Ms. Kerr</p> <p>8 became your performance leader?</p> <p>9 A I don't remember like the actual date or</p> <p>10 date, because I reported, again, to so many</p> <p>11 various -- I pretty much know most of everybody that</p> <p>12 I have -- like by name who I had to report to during</p> <p>13 my whole career there.</p> <p>14 I think I dealt with her more so on the</p> <p>15 International side. I think I -- she was on the</p> <p>16 Domestic side I think for a short while. But by the</p> <p>17 time I, I guess, had gotten out of the Sky Club and</p> <p>18 then on into -- over to the International side,</p> <p>19 that's when she had started being the PL at that</p> <p>20 time, over on that side.</p> <p>21 Q All right. Do you remember what year that</p> <p>22 was?</p> <p>23 A It might have fallen around the -- '13,</p> <p>24 '14. Can't say accurately, because I just honestly</p> <p>25 don't remember. But it was maybe right around that</p>
<p style="text-align: right;">Page 106</p> <p>1 A Performance leaders.</p> <p>2 Q Oh, performance leaders.</p> <p>3 A Yeah, I think they call them OS Sims or</p> <p>4 OSS or something now.</p> <p>5 Q And because you were there for a number of</p> <p>6 years, you reported to a number of different</p> <p>7 performance leaders; correct?</p> <p>8 A Yes.</p> <p>9 Q And during the time -- during part of the</p> <p>10 time you reported to a woman named Carole Kerr;</p> <p>11 correct?</p> <p>12 A Uh-huh.</p> <p>13 Q Say yes.</p> <p>14 A Yes.</p> <p>15 Q Okay.</p> <p>16 A Sorry.</p> <p>17 Q That's okay.</p> <p>18 Are you okay? Do you need a break or</p> <p>19 anything?</p> <p>20 A No, I do not. I'm okay. I'm fine.</p> <p>21 MR. STONE: Let's go off the record for</p> <p>22 one second.</p> <p>23 (Discussion off the record.)</p> <p>24 (Record read.)</p> <p>25</p>	<p style="text-align: right;">Page 108</p> <p>1 window of time that I was on International, like</p> <p>2 between -- yes, between '14. Yeah, right around --</p> <p>3 Q Around 2014?</p> <p>4 A -- 2014 maybe, yeah.</p> <p>5 Q All right. We know that during your</p> <p>6 employment you had some counselings and some</p> <p>7 discipline.</p> <p>8 Do you remember that?</p> <p>9 A I have had, yes.</p> <p>10 Q All right. Fair enough.</p> <p>11 A Yeah, yeah.</p> <p>12 Q Let's do it this way.</p> <p>13 (Exhibit 9 was marked for identification.)</p> <p>14 BY MR. STONE:</p> <p>15 Q Let me show you what's been marked as</p> <p>16 Exhibit No. 9. I don't know if you've seen that</p> <p>17 document before or not. It's a document called,</p> <p>18 Topics Discussed with Employee.</p> <p>19 Have you seen that document before?</p> <p>20 A Is this -- oh, okay. These, I --</p> <p>21 Q I haven't asked you any questions.</p> <p>22 A Oh.</p> <p>23 Q All I've asked is --</p> <p>24 A You just want me to read it.</p> <p>25 Q -- have you seen this document before?</p>

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<p style="text-align: right;">Page 109</p> <p>1 A No. I've never seen -- I've seen three</p> <p>2 things, but it's something that I do see that I had</p> <p>3 not seen before.</p> <p>4 Q All right. Let me start really basic here</p> <p>5 with you, Ms. Stevenson.</p> <p>6 Each of these entries on Exhibit No. 9</p> <p>7 reflects a topic that was discussed with you. It</p> <p>8 might have been a one on one. It might have been a</p> <p>9 coaching. It might have been a verbal warning, for</p> <p>10 example.</p> <p>11 You with me?</p> <p>12 A Uh-huh.</p> <p>13 Q You have to say yes or no.</p> <p>14 A Yes.</p> <p>15 Q All right. My first question is, did you,</p> <p>16 in fact, if you remember, receive either coachings</p> <p>17 or verbal warnings on each date reflected on</p> <p>18 Exhibit No. 9?</p> <p>19 A Could you repeat the question?</p> <p>20 Q Sure. I'm just trying to make sure I</p> <p>21 understand -- I'm not asking you about the specific</p> <p>22 events right now. I'm just asking whether or not</p> <p>23 there were discussions with you about job</p> <p>24 performance issues on each date reflected on Exhibit</p> <p>25 No. 9?</p>	<p style="text-align: right;">Page 111</p> <p>1 date; correct?</p> <p>2 A Yes.</p> <p>3 Q And then you were coached on October 11,</p> <p>4 2012, about coming late to work; correct?</p> <p>5 A Yes.</p> <p>6 Q All right. And then on February 14, 2013,</p> <p>7 you had a conversation with your performance leader.</p> <p>8 That was a verbal warning; correct?</p> <p>9 A I -- this is one of the ones I'm not clear</p> <p>10 completely on.</p> <p>11 Q Okay. I understand that you might</p> <p>12 disagree, for example, that a verbal warning was</p> <p>13 appropriate here. I'm not asking you that question.</p> <p>14 All I'm asking you is, did Delta give you</p> <p>15 a verbal warning on that day, as best you recall?</p> <p>16 A Yes.</p> <p>17 Q Okay. And this event -- the reason</p> <p>18 that -- from Delta's perspective a verbal warning</p> <p>19 was warranted, is reflected at the bottom of page 1</p> <p>20 and most of page 2 of Exhibit 9; correct?</p> <p>21 A Oh, you're talking about the one --</p> <p>22 Q Yes.</p> <p>23 A This is the one we're still talking about?</p> <p>24 Q Yes.</p> <p>25 A Could you say that last part again?</p>
<p style="text-align: right;">Page 110</p> <p>1 A Not each date.</p> <p>2 Q All right. So let's do it then more</p> <p>3 piecemeal.</p> <p>4 There is -- the first entry on Exhibit</p> <p>5 No. 9 is dated August 26, 2012; correct?</p> <p>6 A Yes.</p> <p>7 Q All right. And that reflects a one on one</p> <p>8 that was had with you; correct?</p> <p>9 A Uh-huh --</p> <p>10 Q And --</p> <p>11 A -- yes.</p> <p>12 Q -- you were told that you could start work</p> <p>13 at 3:00 p.m. for the remainder of your bid --</p> <p>14 A Yes.</p> <p>15 Q -- correct?</p> <p>16 So that occurred; correct?</p> <p>17 A Uh-huh. Yes, that did occur.</p> <p>18 Q So that entry is accurate; correct?</p> <p>19 A That's accurate, yes.</p> <p>20 Q You also had a discussion on September 30,</p> <p>21 2012, just a discussion, about your reliability;</p> <p>22 correct?</p> <p>23 A Yes.</p> <p>24 Q And so that's -- it's accurate that there</p> <p>25 was a discussion with you about reliability on that</p>	<p style="text-align: right;">Page 112</p> <p>1 Q Sure. You told me a moment ago that Delta</p> <p>2 gave you a -- did give you a verbal warning on</p> <p>3 February 14, 2013; correct?</p> <p>4 A I don't remember the date. I don't even</p> <p>5 remember this incident at all but --</p> <p>6 Q That's what I was getting at.</p> <p>7 So you don't remember whether you received</p> <p>8 this verbal warning on February 14, 2013; correct?</p> <p>9 A That's Valentine's Day. No, I do not</p> <p>10 remember --</p> <p>11 Q All right.</p> <p>12 A -- this one.</p> <p>13 Q So it -- you might have. You just don't</p> <p>14 recall, as you sit here today; correct?</p> <p>15 A No. And I tend to know pretty much -- I</p> <p>16 don't --</p> <p>17 Q Okay.</p> <p>18 A -- no.</p> <p>19 Q You just can't recall what happened on</p> <p>20 that day.</p> <p>21 A I can't recall.</p> <p>22 Q All right. So you -- so because you can't</p> <p>23 recall, you can't tell me whether this happened,</p> <p>24 didn't happen, what happened.</p> <p>25 A Correctly.</p>

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<p>Page 113</p> <p>1 Q Okay. All right. So then going down on</p> <p>2 the next entry, February 19, 2013, it looks like you</p> <p>3 are coached on that day for swapping with an agent;</p> <p>4 correct?</p> <p>5 A Who was -- does it say who? I remember</p> <p>6 that -- that situation.</p> <p>7 Q All right. So you would swap and agree to</p> <p>8 work for an agent, but then called in and took FMLA</p> <p>9 on that date; correct?</p> <p>10 A I remember this situation, but that's not</p> <p>11 the way the situation was.</p> <p>12 Q Okay. Do you remember what happened?</p> <p>13 A Let me read this.</p> <p>14 Q And if you don't, it's okay. I just --</p> <p>15 A I -- I remember it, but it definitely was</p> <p>16 nothing that I did wrong.</p> <p>17 Q Okay.</p> <p>18 A I just --</p> <p>19 Yes. That wasn't the situation. It was</p> <p>20 a -- and this particular person had a kind of</p> <p>21 altercation.</p> <p>22 I -- I didn't -- I didn't bail on this</p> <p>23 person. I never bailed on anybody. And I worked</p> <p>24 for -- I was one -- I worked for everybody.</p> <p>25 Q Do you remember this particular situation?</p>	<p>Page 115</p> <p>1 Q Sure. If you -- you tell me if you -- if</p> <p>2 you remember the story, you let me know during the</p> <p>3 course of the day. Okay?</p> <p>4 A Yeah, I -- I remember some of it but -- I</p> <p>5 remember some -- I remember proving that. Once I</p> <p>6 sat there and explained it at the time to the PL, it</p> <p>7 was like, I get it. Like it was one of those deals</p> <p>8 like I didn't -- I never bailed on anybody I had to</p> <p>9 work for.</p> <p>10 Q But you don't remember what happened in</p> <p>11 this particular situation.</p> <p>12 A Not --</p> <p>13 Q Not really?</p> <p>14 A -- not now. I can't remember. That was</p> <p>15 in '13.</p> <p>16 Q Turning to page 3 of Exhibit No. 9, it</p> <p>17 looks like there's a series of verbal coachings that</p> <p>18 you would have received on -- in December 2013 --</p> <p>19 A Uh-huh.</p> <p>20 Q -- on March 9, 2014, on March 22, 2014.</p> <p>21 Do you see all those?</p> <p>22 A Uh-huh.</p> <p>23 Q And those are all -- you received those</p> <p>24 coachings on those days, as best you recall?</p> <p>25 A Yeah. I remember speaking with Ron, EMP,</p>
<p>Page 114</p> <p>1 A I kind of do. It's -- I'm being honest,</p> <p>2 this is, like I say, so long ago. I'll touch on it.</p> <p>3 I really think -- no, what I know, I do know that</p> <p>4 that wasn't the case. I did not bail on her.</p> <p>5 If I remember correctly, it was something</p> <p>6 that had already been canceled out. Like I wasn't</p> <p>7 even due to even work for her. But somebody on</p> <p>8 their end did not make the correction. Because when</p> <p>9 me and -- when me and this person actually finally</p> <p>10 even talked about she's like, I know you already</p> <p>11 told me you weren't going to be able to do it that</p> <p>12 day.</p> <p>13 This is not accurate. This isn't</p> <p>14 accurate. And I remember -- I think I remember even</p> <p>15 this conversation. I'm not -- it's not showing the</p> <p>16 PL that -- which PL? Because maybe that will help</p> <p>17 me remember. I do remember this. I really, really</p> <p>18 do but --</p> <p>19 Q But you can't give me the details?</p> <p>20 A This might have happened when I was in</p> <p>21 baggage. It might have been -- what's his name?</p> <p>22 He's a manager now. I think this was when I was in</p> <p>23 baggage. Michael -- is it Cousins? That -- I don't</p> <p>24 know.</p> <p>25 Can we come back to that?</p>	<p>Page 116</p> <p>1 because I was having the issues. Yeah, I remember</p> <p>2 missing --</p> <p>3 Q And then it looks like you were coached on</p> <p>4 March 23, 2014, correct --</p> <p>5 A Uh-huh.</p> <p>6 Q -- about making sure you complied with</p> <p>7 safety rules; right?</p> <p>8 A Uh-huh.</p> <p>9 Q Yes?</p> <p>10 A Yes.</p> <p>11 Q Sorry, you have to say yes.</p> <p>12 A Oh, yes, yes.</p> <p>13 Q And then it looks like on March 7, 2015,</p> <p>14 you were -- Ms. Kerr gave you a coaching about -- or</p> <p>15 at least spoke to you about uniform guidelines and</p> <p>16 making sure you stayed in compliance with those;</p> <p>17 correct?</p> <p>18 A Could I read that for a second?</p> <p>19 Q Sure. Take your time.</p> <p>20 A I just -- I'll be quick.</p> <p>21 That 3-7-15, that is totally inaccurate.</p> <p>22 Q Well, tell me what -- tell me what</p> <p>23 Ms. Kerr --</p> <p>24 A I was --</p> <p>25 Q Stop, I'm sorry, let me ask the question</p>

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<p style="text-align: right;">Page 117</p> <p>1 again.</p> <p>2 It's not inaccurate that Ms. Kerr talked</p> <p>3 to you about your shoes; correct?</p> <p>4 A It's accurate that something was stated</p> <p>5 about them. I was never coached. I was never</p> <p>6 talked to. I was never walked in the office.</p> <p>7 Because usually the way coaching goes, the reason I</p> <p>8 know this is because the way I know Ms. Lee and Ron</p> <p>9 would always do stuff, like, you know, they -- they</p> <p>10 coach you. Sometimes they would even have you sign</p> <p>11 or something. But this isn't the way of which this</p> <p>12 happened at all.</p> <p>13 Q Did Ms. Kerr talk to you about your shoes?</p> <p>14 A She didn't talk to me about my shoes. It</p> <p>15 didn't occur that way. It didn't quite occur that</p> <p>16 way.</p> <p>17 Q What did she say to you?</p> <p>18 A It was -- it didn't occur in the way</p> <p>19 that -- in the way that it's stated, it's on here,</p> <p>20 it's on here being in the way that -- my other PLs</p> <p>21 professionally, like, you know, they did it the way</p> <p>22 they were supposed to do it. This was not done in</p> <p>23 the way that it was supposed to have been done.</p> <p>24 Q Well, Ms. Kerr coached about your shoes;</p> <p>25 correct?</p>	<p style="text-align: right;">Page 119</p> <p>1 me that particular day.</p> <p>2 Q All right. What else did she say to you</p> <p>3 that you thought was bothersome or abrupt or</p> <p>4 inappropriate on any day?</p> <p>5 A If I'm in the middle of doing my job, and</p> <p>6 somebody is in front of me, and I'm whatever, I've</p> <p>7 been pushed aside by her, physically pushed aside,</p> <p>8 Move, step aside, you're moving too slow. I don't</p> <p>9 say anything.</p> <p>10 Q When did that happen?</p> <p>11 A I'll be honest, it was one of our IROP</p> <p>12 nights. I do not know the date or the time. I just</p> <p>13 do know that that particular occurrence, one of my</p> <p>14 counterparts, I don't remember his name, but I'll</p> <p>15 know him if I see him because he still works there,</p> <p>16 he has the locks in his hair. And he was like, Wow,</p> <p>17 like she is very, very rude and -- to you, Q, and</p> <p>18 treats you kind of horribly.</p> <p>19 I said (indicating). I just kind of</p> <p>20 didn't really say much because I didn't want to -- I</p> <p>21 looked at it as my supervisor. I didn't want to be</p> <p>22 in the hot seat or called -- make any waves.</p> <p>23 The passenger that was actually -- that I</p> <p>24 was initially waiting on stated, Is that your</p> <p>25 supervisor?</p>
<p style="text-align: right;">Page 118</p> <p>1 A She didn't coach me. We weren't in the</p> <p>2 office. It was nothing like that.</p> <p>3 Q What did she say to you?</p> <p>4 A It was -- I was -- we had finished up our</p> <p>5 briefing. It was very, very -- it was to the point</p> <p>6 where my colleagues actually commented on the</p> <p>7 abruptness. I was constantly bothered by her. It</p> <p>8 was a constant thing.</p> <p>9 But this particular day was very constant</p> <p>10 with, I don't like the shoes. I don't like your</p> <p>11 shoes. Those aren't the right shoes. Out of</p> <p>12 compliance. These are the same shoes that I started</p> <p>13 my career at Delta with.</p> <p>14 Q Other than Ms. Kerr saying, I don't like</p> <p>15 your shoes, your shoes out of compliance, did she</p> <p>16 say anything else to you?</p> <p>17 A On another day --</p> <p>18 Q On that day, is that all she said to you,</p> <p>19 as best you can recall?</p> <p>20 A That's all -- that was all on that</p> <p>21 particular day. And that was it. And she walked --</p> <p>22 actually, kind of walked away, went to her office.</p> <p>23 And I walked out the side door to get to my Delta</p> <p>24 Direct where I was working at the time, which was on</p> <p>25 E Concourse, Delta Direct. She said nothing else to</p>	<p style="text-align: right;">Page 120</p> <p>1 I said, Yes.</p> <p>2 She is very rude to you.</p> <p>3 Q Now, this is the night of the IROP</p> <p>4 situation?</p> <p>5 A This was the IROP night.</p> <p>6 Q So let me stop you and make sure I</p> <p>7 understand.</p> <p>8 So you're working. It's an IROPs night,</p> <p>9 which is irregular operations --</p> <p>10 A Irregular operations, yes.</p> <p>11 Q So it's chaotic --</p> <p>12 A Yes.</p> <p>13 Q -- at the airport.</p> <p>14 A It is chaotic, yes.</p> <p>15 (Discussion off the record.)</p> <p>16 BY MR. STONE:</p> <p>17 Q And Ms. Kerr says to you, You're moving</p> <p>18 too slowly --</p> <p>19 A Oh, yep.</p> <p>20 Q -- she pushes you aside and starts working</p> <p>21 the computer?</p> <p>22 A I was doing this, and she's -- she -- Step</p> <p>23 aside. Of course, I didn't give her -- I just -- I</p> <p>24 just -- I stepped aside, and just let her do what</p> <p>25 she did. And she initially moved. And I went back</p>

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<p>Page 121</p> <p>1 and I just started doing what I was doing after she</p> <p>2 was done.</p> <p>3 Passenger proceeded to say, Is that your</p> <p>4 supervisor?</p> <p>5 I said, like kind of common sense, Yes.</p> <p>6 She was very rude to you.</p> <p>7 Q All right. Other than --</p> <p>8 A I didn't comment on it. I just kept --</p> <p>9 because I know we don't get into that with the</p> <p>10 passenger. I just kept doing what I was doing.</p> <p>11 That was another day.</p> <p>12 Another day -- like the stuff in here</p> <p>13 stated, it's correctly, but it's not put in here</p> <p>14 right. I had a bracelet on. I was in briefing. We</p> <p>15 were finishing up briefing. Get ready to get out.</p> <p>16 I go into the -- we come out of the briefing. I go</p> <p>17 in the side door again. I'm in the middle of my</p> <p>18 shift, working, doing what I'm doing. She walks</p> <p>19 over to me (indicating), Take that off, take that</p> <p>20 off.</p> <p>21 Q Tells you to take off your bracelet?</p> <p>22 A Yeah. I was literally doing this. She</p> <p>23 walks up. She touches it. Take that off.</p> <p>24 Q Okay.</p> <p>25 A So I was like, Okay.</p>	<p>Page 123</p> <p>1 copy.</p> <p>2 I said, Well, they -- you all -- they read</p> <p>3 it in the -- in the briefing. I just wanted to just</p> <p>4 get a copy of it, just so I could have it for my</p> <p>5 files and show my parents a nice -- I just wanted --</p> <p>6 I usually keep a copy of my stuff like that.</p> <p>7 And she's like, I don't have it. You</p> <p>8 know, you can go in the office. I need to shut the</p> <p>9 door.</p> <p>10 And I said, Okay. And I never asked her</p> <p>11 about that again. It was just --</p> <p>12 Q Anything else, other than -- that you can</p> <p>13 tell me about?</p> <p>14 A That's it that I can think of right now.</p> <p>15 That's -- those are like one of the four main</p> <p>16 things.</p> <p>17 Q All right. You are aware, I take it, that</p> <p>18 because Delta provides free travel for employees and</p> <p>19 their travel companions that a potential for abuse</p> <p>20 exists.</p> <p>21 A Yes, it does.</p> <p>22 Q There's a potential that the passes might</p> <p>23 be sold which would violate Delta rules.</p> <p>24 A Exactly.</p> <p>25 Q There's a possibility that passes would be</p>
<p>Page 122</p> <p>1 And, again, coworkers was just, Wow.</p> <p>2 I said nothing. I proceeded to take it</p> <p>3 off. Just very, very aggressive with me. Stuff</p> <p>4 that I didn't see with other people. Just very,</p> <p>5 very aggressive in the way that I was being talked</p> <p>6 to.</p> <p>7 Q Can you give me -- are there any other</p> <p>8 circumstances that you can think of, other than the</p> <p>9 ones --</p> <p>10 A I don't even know if I can even remember</p> <p>11 them all, Ben, because I was just being</p> <p>12 constantly -- constantly said things to. It was --</p> <p>13 it became real constant with her, very, very</p> <p>14 constant.</p> <p>15 Q Did she do anything else that you can</p> <p>16 specifically remember?</p> <p>17 A The bracelet. The shoe. The night of</p> <p>18 being -- Step aside.</p> <p>19 Well, and I remember an instance where a</p> <p>20 pilot wrote in a good letter about something I did,</p> <p>21 above and beyond. They read it in the briefing. It</p> <p>22 was sent directly to Carol's e-mail or whatever.</p> <p>23 And I asked her if I could get a copy of</p> <p>24 that. And she proceeded to say, What e-mail are you</p> <p>25 talking about? I didn't get that. I don't have a</p>	<p>Page 124</p> <p>1 used for business travel, which would violate</p> <p>2 Delta's rules; correct?</p> <p>3 A Yes.</p> <p>4 Q And you are aware -- let me stop right</p> <p>5 there. I realize there's two things I wanted to</p> <p>6 show you very quickly.</p> <p>7 (Exhibits 10 and 11 were marked for</p> <p>8 identification.)</p> <p>9 THE WITNESS: She's my favorite.</p> <p>10 BY MR. STONE:</p> <p>11 Q I'm going to show you, first of all,</p> <p>12 Exhibit 10 and then Exhibit 11.</p> <p>13 A Uh-huh.</p> <p>14 Q And just ask if these are counselings and</p> <p>15 disciplines that you received while you were at</p> <p>16 Delta. That's all I'm going to ask you.</p> <p>17 A Uh-huh.</p> <p>18 Oh, you ready for me? Sorry.</p> <p>19 Q Yes. Can you answer the question? Did</p> <p>20 you receive those?</p> <p>21 A Yes, I did.</p> <p>22 Q And you mentioned, when you were looking</p> <p>23 at No. 10, you said, She's my favorite.</p> <p>24 Who were you speaking of?</p> <p>25 A Velma Edwards.</p>

<p style="text-align: right;">Page 125</p> <p>1 Q She was your favorite performance leader?</p> <p>2 A Uh-huh.</p> <p>3 Q You guys --</p> <p>4 A Yeah.</p> <p>5 Q You guys got along well?</p> <p>6 A Very.</p> <p>7 Q Other than Ms. Kerr, is there any</p> <p>8 performance leader that you ever had any problems</p> <p>9 with or didn't get along with that you can recall?</p> <p>10 A I would say not -- not to -- we're just</p> <p>11 talking performance leaders, right, because I'll get</p> <p>12 to the other later. But I have not had any of</p> <p>13 the -- any of those kinds of encounters with any</p> <p>14 other performance leader like that, except for</p> <p>15 Carole Kerr.</p> <p>16 Q Okay.</p> <p>17 A However -- how do I word it? Not to</p> <p>18 the -- not to that level.</p> <p>19 Love her. She -- yeah.</p> <p>20 Q The other ones treated you fairly, other</p> <p>21 than Ms. Kerr?</p> <p>22 A I'm sorry, say that --</p> <p>23 Q The other performance leaders, other than</p> <p>24 Ms. Kerr, you think treated you fairly.</p> <p>25 A They -- yeah, the others treated me</p>	<p style="text-align: right;">Page 127</p> <p>1 Cheryl Taylor actually --</p> <p>2 Q Let me -- let's stop because we're way,</p> <p>3 way, way off my question here.</p> <p>4 A Okay.</p> <p>5 Q Let's do this slowly and a little bit more</p> <p>6 methodically here, Ms. Stevenson.</p> <p>7 A Okay.</p> <p>8 Q First of all, you have in front of you</p> <p>9 Exhibit No. 11?</p> <p>10 A Uh-huh.</p> <p>11 Q Yes?</p> <p>12 A Yes.</p> <p>13 Q I think you told me a moment ago that</p> <p>14 other than Ms. Kerr your other performance leaders</p> <p>15 treated you fairly.</p> <p>16 But you do believe that Exhibit No. 11 is</p> <p>17 one instance where you were treated unfairly;</p> <p>18 correct?</p> <p>19 A Yes. I was treated -- yeah. Oh, okay.</p> <p>20 Q So let's explore Exhibit No. 11 for a</p> <p>21 second.</p> <p>22 You were getting a probation letter in</p> <p>23 November of 2010; correct?</p> <p>24 A Yes.</p> <p>25 Q All right. And the reason is is because</p>
<p style="text-align: right;">Page 126</p> <p>1 fairly.</p> <p>2 The only thing I want to -- am I allowed</p> <p>3 to just comment on one thing. This is fine.</p> <p>4 Because -- yeah, that's -- yeah.</p> <p>5 This one here though, I -- I always felt</p> <p>6 this one was not fair.</p> <p>7 Q Okay.</p> <p>8 A It's not that I have an issue with the</p> <p>9 performance leader, Performance Leader Marcus. I</p> <p>10 like him. Taneesha, like her too. I just feel like</p> <p>11 this was very inaccurate to where I worked. And I</p> <p>12 feel like I was treated unfairly, based off of how I</p> <p>13 watched my veteran counterparts, coworkers deal with</p> <p>14 the passengers at the time.</p> <p>15 And because I did feel unfairly about</p> <p>16 this, Ben, I actually did go to HR about this</p> <p>17 situation, and I did speak with -- she's dead now.</p> <p>18 She worked -- Cheryl Taylor. She spoke with me and</p> <p>19 Marcus. And based off of some of what I'm even</p> <p>20 telling you now, I went over it with her, with some</p> <p>21 of the things that I went through with -- in the Sky</p> <p>22 Club -- that's one of the other reasons that I did</p> <p>23 get out as well, because they weren't offering -- as</p> <p>24 I stated earlier, they weren't offering the full</p> <p>25 time so I bidded out. But I also bidded out because</p>	<p style="text-align: right;">Page 128</p> <p>1 there's a celebrity in the club room, correct, in</p> <p>2 Sky Club?</p> <p>3 A Yes.</p> <p>4 Q Who's the celebrity?</p> <p>5 A It was the Neelys. They're --</p> <p>6 Q I know them.</p> <p>7 A -- from the Food Network. They were</p> <p>8 very -- well, I guess they -- they were extremely</p> <p>9 nice to me.</p> <p>10 Q And they -- one of the things happened,</p> <p>11 that you started talking with them; correct?</p> <p>12 A Yes. They were my -- my passengers that I</p> <p>13 had to escort. And in escorting them, you're</p> <p>14 talking to them, they -- you hold conversations.</p> <p>15 Q All right.</p> <p>16 A Uh-huh.</p> <p>17 Q And during the conversation, you asked the</p> <p>18 Neelys to give you a shout out related to your music</p> <p>19 career; is that correct?</p> <p>20 A No. I never did that. That's why I said.</p> <p>21 If I -- I never asked them to give me a shout out.</p> <p>22 If anything, it was -- my mother is a big fan of</p> <p>23 their show. And I was like, Oh, gosh, she's just</p> <p>24 going to be -- well, I'm not -- whatever it says</p> <p>25 here, because I don't want to, again, not say</p>

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<p style="text-align: right;">Page 129</p> <p>1 nothing that's not accurate. Within here, if I read</p> <p>2 it, that part should be pretty accurate. But I</p> <p>3 didn't -- I do not recall asking them to give me a</p> <p>4 shout out. That part is fabricated, yeah.</p> <p>5 Q So you don't know whether or not what was</p> <p>6 reported to Delta? So you don't know what Delta was</p> <p>7 told about your conduct; correct?</p> <p>8 A Well, other than what I'm seeing right</p> <p>9 here.</p> <p>10 Q All right.</p> <p>11 A And that's why I said I went to HR about</p> <p>12 this situation, and we actually did discuss --</p> <p>13 Q You've got to answer my question.</p> <p>14 A Oh, okay.</p> <p>15 Q Listen to my question and answer my</p> <p>16 question, Ms. Stevenson. Here's my question.</p> <p>17 You don't -- first of all, you told me a</p> <p>18 minute ago, other than what you see here, you don't</p> <p>19 know what the passenger reported; correct?</p> <p>20 A No, I do not. I just know what my</p> <p>21 performance leader told me they said.</p> <p>22 Q Okay. And it says here that the Gold</p> <p>23 Medallion passenger, and by your own admission, you</p> <p>24 asked the passenger to give you a shout out.</p> <p>25 Do you see that?</p>	<p style="text-align: right;">Page 131</p> <p>1 so, and you just don't recall that, as you sit here</p> <p>2 today? Is that possible?</p> <p>3 A That's not possible.</p> <p>4 Q All right. So --</p> <p>5 A And if I remember correctly when I was in</p> <p>6 the meeting with Taneesha and Marcus, I think I --</p> <p>7 well, no, not think. I remember saying to them, I</p> <p>8 didn't say anything about -- I did say that. I</p> <p>9 said, I didn't say anything about my music, I said,</p> <p>10 but I'm being honest, I did say about my mom. And</p> <p>11 the reason I know I said, Hey, you know, can you say</p> <p>12 hello to my mom, because my mother, at that time --</p> <p>13 they're not even married anymore.</p> <p>14 But, at that time, my mother watched that</p> <p>15 show -- she loved the Neelys. She was a fan. So</p> <p>16 seeing them, it was like -- and everything I'm</p> <p>17 saying to you I said it in this same way, same</p> <p>18 demeanor with Taneesha and Marcus.</p> <p>19 And they was like, Well, okay, just don't</p> <p>20 do that again, Q. We get it. We get that you all</p> <p>21 see celebrities. You get excited. We all have --</p> <p>22 that's kind of how that particular meeting went. It</p> <p>23 was -- it's just -- it's a little -- it's</p> <p>24 fabricated. I said, Well, yeah, I would never --</p> <p>25 Q Did you ask for -- did you take a picture</p>
<p style="text-align: right;">Page 130</p> <p>1 A Yes, but I -- those were not my words.</p> <p>2 I --</p> <p>3 Q So you're --</p> <p>4 A I do not recall -- I would never -- I was</p> <p>5 in the Sky Club for a long time, and I saw many</p> <p>6 celebrities that were -- yeah.</p> <p>7 Q You --</p> <p>8 A I never said give me a shout out.</p> <p>9 Q Well, you just told me you don't recall</p> <p>10 saying that.</p> <p>11 A Yeah. Well, I do not recall -- I don't</p> <p>12 think -- I would never ask them to give me a shout</p> <p>13 out for my music. And they weren't even in that --</p> <p>14 they weren't even in that -- they couldn't help a</p> <p>15 music career at all.</p> <p>16 Q Are you able to testify with certainty and</p> <p>17 under oath --</p> <p>18 A Yes. I do not recall ever saying -- I</p> <p>19 asked them to give me a -- they're a cooking</p> <p>20 network. They're not Jay-Z.</p> <p>21 Q You're testifying that you don't recall.</p> <p>22 And I'm going to ask you a different</p> <p>23 question --</p> <p>24 A Okay.</p> <p>25 Q -- which is, is it possible that you did</p>	<p style="text-align: right;">Page 132</p> <p>1 with them or ask for a picture?</p> <p>2 A I don't -- I might have. I'll be honest,</p> <p>3 I don't remember. That was so long ago.</p> <p>4 Q Did you ask them --</p> <p>5 A I might have asked for a picture. I might</p> <p>6 have asked for an autograph. Like I say, most of</p> <p>7 that -- but the music part, that part, I'll be</p> <p>8 honest, I think that is -- that part, I don't -- I</p> <p>9 don't think I asked them for a shout out with my</p> <p>10 music, because they're not -- I mean -- yeah, they</p> <p>11 can't help my -- they couldn't help music.</p> <p>12 Q So you just told me --</p> <p>13 A But my mother --</p> <p>14 Q -- everything you can recall about this?</p> <p>15 A Yeah, the mother, all of that is accurate.</p> <p>16 I talked -- yeah, we talked about the mom. They</p> <p>17 were talking and laughing with me. I had no idea,</p> <p>18 Ben, at that time, that they felt the way they felt,</p> <p>19 meaning -- we're around celebrities a lot in the Sky</p> <p>20 Club. And if they don't want to be bothered,</p> <p>21 they'll say, No, or whatever. They held a whole</p> <p>22 conversation with me, laughed, talked.</p> <p>23 So I didn't know any different, other than</p> <p>24 they were -- they were very engaging. The next</p> <p>25 thing I knew it was, well, no, they didn't want to</p>

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1 talk. But they didn't say that they didn't want to
2 talk. So I didn't know any --
3 Q You understand that they complained to
4 Delta about what you did.
5 A Yeah, per my -- per my supervisor at that
6 time, and I -- yeah, I did.
7 Q All right. You told me that you went to
8 Cheryl Taylor in HR --
9 A I did.
10 Q -- and complained about this discipline;
11 correct?
12 A Yes, I did.
13 Q All right. The discipline remained in the
14 file though; correct?
15 A Here's the thing now --
16 Q You've got to answer my question.
17 Correct?
18 A Well, there were some things -- at that
19 time, she looked at Marcus, and she said, Well,
20 we're going to have this -- there were certain --
21 she said, We're going to have this removed. You
22 know, there were -- it was that. And it was
23 something else that I had complained about at the
24 time. It all was just so much. It's just that
25 Cheryl Taylor had said that she would have -- she'd

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1 have it removed. Now, I actually --
2 Q Wait, wait, wait, stop.
3 Are you telling me that Cheryl Taylor told
4 you the letter -- portions of the letter were going
5 to change?
6 A I don't -- I'll be -- I'm up -- to be
7 clear, I don't know -- because I know Marcus would
8 remember this whole thing, if he's still there. He
9 would remember. I don't know if it was the letter
10 or whatever.
11 But the way -- how I'm discussing this
12 with you, me, Marcus and Cheryl Taylor discussed --
13 Taneesha wasn't in that particular meeting. It was
14 just the three of us, and all of this was discussed.
15 And I was like -- well, I didn't -- I was like I
16 wasn't -- We get it, Q. We get you didn't -- I get
17 it. It's just, you know, they didn't get that.
18 That's why they complained. It's not saying that
19 you didn't act -- you weren't unprofessional.
20 Because that's my whole thing. I said, I
21 didn't handle them unprofessionally. I handled
22 them -- I'm very friendly, so I handled them in a
23 friendly way. And that's kind of how we was
24 discussing. And that's why I was telling her I just
25 didn't understand why I would be wrote up for being

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1 friendly. We're supposed to be friendly.
2 Q But you understood that you're not
3 supposed to ask for autographs with celebrities or
4 take pictures with celebrities; correct?
5 A Well, after the fact. I'll be honest, I
6 didn't get that before because I watched the people
7 that were training me -- and, again, I'm not going
8 to get into other people's business. So I thought I
9 was just doing what I saw the people that had worked
10 there longer than me asking people for autographs.
11 They didn't get reprimanded or nothing. So I
12 thought when I saw my mom's biggest fans, I thought
13 it was okay.
14 Q Who else asked for an autograph that you
15 saw?
16 A Well, there are -- I mean I'm not going --
17 again, I've seen my coworkers at the time when I
18 worked in there.
19 Q Who?
20 A Who?
21 Q Yeah.
22 A I don't -- I can't say like names or
23 nothing because it's various. It's various people
24 I'm saying that --
25 Q Can you tell me one name?

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1 A Well, they -- they've asked for pictures.
2 Q Who?
3 A I don't want -- I don't, you know, want to
4 bother like --
5 Q Who?
6 A There are various people that --
7 Q Name one.
8 A -- say, Can we get -- can we get a
9 photo --
10 Q Name one person.
11 A -- have a photo with you?
12 Well, that was years ago, Ben.
13 Q So you can't.
14 A No. It's not that I can't. I'm just
15 saying like there are people in there --
16 Q Name one person, Ms. Stevenson.
17 A But I mean like social media, like you all
18 can't see that.
19 Q Name one person, Ms. Stevenson. Answer
20 the question.
21 A I don't want to get anybody in trouble for
22 asking --
23 Q Ms. Stevenson --
24 -- for a picture.
25 Q -- that's not the question. Please answer

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<p style="text-align: right;">Page 137</p> <p>1 my question. Name one person.</p> <p>2 A She's such a good employee.</p> <p>3 Q Who is it?</p> <p>4 A I mean they just asked for a photo, and</p> <p>5 the celebrity give it to them.</p> <p>6 Q Who?</p> <p>7 A Lucille.</p> <p>8 Q Who is Lucille?</p> <p>9 A I don't know her last name. She's an</p> <p>10 awesome employee. I don't remember her last name</p> <p>11 because she's married now. She's a nice person</p> <p>12 but --</p> <p>13 Q What was her last name?</p> <p>14 A I don't -- I don't remember her last name.</p> <p>15 But she's one of the people that trained -- she's</p> <p>16 been in there for years. When I say -- like she's</p> <p>17 very professional. It's not like -- you know, like</p> <p>18 bombarding the people. But it's like, Oh, she's</p> <p>19 just like, can I get a -- when the people walking</p> <p>20 out, Can we get a picture? You know, I'm sitting</p> <p>21 there, and, you know, the celebrity is laughing.</p> <p>22 Q Ms. Stevenson, I'm begging you, listen to</p> <p>23 my question. Okay?</p> <p>24 A Well, that's just one person I'm saying</p> <p>25 that work there.</p>	<p style="text-align: right;">Page 139</p> <p>1 Q Do you know is she older, younger, about</p> <p>2 your age?</p> <p>3 A She's -- well, no, I'm in my 40s. She</p> <p>4 is -- Lucille may be in her 50s. She might be in</p> <p>5 her 50s.</p> <p>6 Q All right.</p> <p>7 A You know --</p> <p>8 Q All right. And do you -- why do you think</p> <p>9 they were mean to you and not to Lucille?</p> <p>10 A She wasn't mean to me.</p> <p>11 Q Why do you think they disciplined you and</p> <p>12 not Lucille?</p> <p>13 A No. Here, that's -- let me make that</p> <p>14 clear. I'm not saying that they did not discipline</p> <p>15 Lucille. I don't --</p> <p>16 Q You don't know.</p> <p>17 A Yes. Oh, I don't know. I've never -- I</p> <p>18 don't want -- yeah, I didn't say that. No, I'm not</p> <p>19 saying that.</p> <p>20 Q All right.</p> <p>21 A It's tons of people that work at Delta</p> <p>22 that take pictures with celebrities.</p> <p>23 Q Yeah.</p> <p>24 A I'm just saying -- yeah, I don't know her</p> <p>25 business. I'm just saying she's one of the people</p>
<p style="text-align: right;">Page 138</p> <p>1 Q Name another person, if you can remember</p> <p>2 any.</p> <p>3 A I don't have another name.</p> <p>4 Q All right. And can you tell me anything</p> <p>5 about Lucille, what her last name is, what she looks</p> <p>6 like?</p> <p>7 A I don't know -- like I said -- she's --</p> <p>8 she's maybe -- she's about her height. She's about</p> <p>9 Sheandra's height.</p> <p>10 Q What does she look like?</p> <p>11 A She may be like a -- maybe your complexion</p> <p>12 too, maybe a tad darker.</p> <p>13 Q She's African American?</p> <p>14 A Yeah, she's African American, very sweet,</p> <p>15 very friendly. And I forget what that guy -- it was</p> <p>16 a tall guy, I just remember. And he's like -- you</p> <p>17 know, people have gotten -- like I said, like on the</p> <p>18 way out, I remember that day. It was just like</p> <p>19 standing right by the elevator. I -- again, I don't</p> <p>20 know what B looks like. Somebody told me B looks --</p> <p>21 Q Ms. Stevenson, I haven't asked you this</p> <p>22 question.</p> <p>23 All I've asked you is what she looks like.</p> <p>24 That's all I've asked you.</p> <p>25 A Well --</p>	<p style="text-align: right;">Page 140</p> <p>1 that trained me.</p> <p>2 Q Okay.</p> <p>3 A So when I see my veteran people --</p> <p>4 Q I haven't asked you this. Stop.</p> <p>5 A Oh, okay.</p> <p>6 Q All right. Do you --</p> <p>7 A I don't want to get that lady in trouble.</p> <p>8 Q Do you -- strike that. Let me start</p> <p>9 again.</p> <p>10 We've just talked about you going to</p> <p>11 Cheryl Taylor and making a complaint about</p> <p>12 Exhibit No. 11; correct?</p> <p>13 A Yeah, 11. It was 11 and -- and something</p> <p>14 else. I didn't really --</p> <p>15 Q What was the something else?</p> <p>16 A -- review this thing.</p> <p>17 Yeah. That's probably --</p> <p>18 Q Okay. And you --</p> <p>19 A It was this --</p> <p>20 Q Wait, stop.</p> <p>21 (Discussion off the record.)</p> <p>22 BY MR. STONE:</p> <p>23 Q Let's go back. You said a moment ago,</p> <p>24 Ms. Stevenson, that in addition to complaining about</p> <p>25 Exhibit 11 that you complained about something else</p>

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<p style="text-align: right;">Page 141</p> <p>1 to Ms. Taylor.</p> <p>2 What was the something else?</p> <p>3 A The something else was -- it was this, and</p> <p>4 it was the Red Coat at that time in the Sky Club. I</p> <p>5 don't even think he's in there anymore. She had</p> <p>6 that removed from a file too. I remember that</p> <p>7 because she said she was going to have that done.</p> <p>8 She was going to have that done right -- she was</p> <p>9 like, We're going to remove it right now.</p> <p>10 Q Ms. Stevenson, stop. What was the</p> <p>11 something else?</p> <p>12 A It was the Red Coat told a lie on me and</p> <p>13 Lucille and Stan, I don't remember his last name,</p> <p>14 they both work in the Sky Club, they were -- they</p> <p>15 vouched for me and told Marcus that it was -- told</p> <p>16 the performance leaders that that Red Coat actually</p> <p>17 lied on me.</p> <p>18 Q What lie did the Red Coat say?</p> <p>19 A When we worked in the Sky Club, there was</p> <p>20 a call that we had to make. That they'd call and</p> <p>21 do -- like we have to do like weekly, I'm trying to</p> <p>22 remember because this was so long ago, these little</p> <p>23 like briefing things. And we all have to call in</p> <p>24 and say, Hey, it's Q, B25. Hey, it's such and such,</p> <p>25 C whatever. We'd call in. And each day they'd give</p>	<p style="text-align: right;">Page 143</p> <p>1 yeah.</p> <p>2 Q Other than this complaint that you've just</p> <p>3 described, and your complaint about Exhibit 11 --</p> <p>4 A Uh-huh.</p> <p>5 Q -- did you ever complain to HR about any</p> <p>6 other unfair or inappropriate treatment that you</p> <p>7 thought you were receiving while you were at Delta?</p> <p>8 A The only other thing, with this same --</p> <p>9 the Red Coat, was I did -- I did express to Cheryl</p> <p>10 that -- and she made me understand some things, so I</p> <p>11 don't want you to think I'm being hostile with this</p> <p>12 part. But I told her that the person had made a</p> <p>13 couple of advances.</p> <p>14 But, again, that was worked out at that</p> <p>15 time, so I don't want to make it like I'm not -- I'm</p> <p>16 not here to hurt anybody -- hurt anybody. I'm not</p> <p>17 here to hurt Delta. I love Delta. But that</p> <p>18 particular person at the time that did lie on me,</p> <p>19 also had constantly kind of made little personal</p> <p>20 references, advances, and I, you know, was not --</p> <p>21 Q Was asking you out on dates?</p> <p>22 A Yes. And I -- yeah. And like, Well, we</p> <p>23 should do something, this, that and the other. And</p> <p>24 I stated that to Ms. Taylor. Marcus was sitting</p> <p>25 there. And, again, she just had to remove -- she</p>
<p style="text-align: right;">Page 142</p> <p>1 a different person the assignment to call and give</p> <p>2 the report and the reviews of like the liquor count</p> <p>3 and all of that that goes on, the people count, the</p> <p>4 liquor count, all of that.</p> <p>5 Well, that particular day, the -- he was</p> <p>6 actually assigned to do it. Failed to do it,</p> <p>7 forgot, missed the actual call. PL comes in and is</p> <p>8 like, Why weren't you on the call?</p> <p>9 When this all occurred, if I remember</p> <p>10 correctly, it was like Taneesha or Marcus that had</p> <p>11 actually designated him to do it. It didn't get</p> <p>12 done. Stan and Lucille actually witnessed this go</p> <p>13 down. And I got reprimanded for it and got called</p> <p>14 in the office and said, Well, write me up. And when</p> <p>15 I came out, they came and they was like, Well, you</p> <p>16 don't say nothing.</p> <p>17 So when I come out they were like, What</p> <p>18 did -- I said, They -- I don't know. I think they</p> <p>19 wrote me up or reprimanded me, and I didn't even do</p> <p>20 anything. They're like, You didn't do that, Q. We</p> <p>21 know you didn't do that. We'll let them know. But</p> <p>22 it ended up on my file.</p> <p>23 Q All right. But it was taken out by</p> <p>24 Ms. Taylor?</p> <p>25 A Cheryl -- yeah, per -- I think she's --</p>	<p style="text-align: right;">Page 144</p> <p>1 was like, you know what, men are men, women are</p> <p>2 women. When people see something -- so we'll get</p> <p>3 it -- I'm going to clear it out, and she did.</p> <p>4 So I'm just being honest about that. So I</p> <p>5 went through a lot there. I was going to get to</p> <p>6 that. That was one of the reasons. Along with</p> <p>7 wanting full-time benefits, and the couple of things</p> <p>8 that I did go through in there, that was why I</p> <p>9 bidded it out. And I said, you know, I just want to</p> <p>10 go somewhere for some peace and work and enjoy my</p> <p>11 career and be quiet. And that's what I did.</p> <p>12 When I was done with this also, Ben --</p> <p>13 Q All right. Stop, because I've not asked</p> <p>14 you about that.</p> <p>15 A Oh, okay.</p> <p>16 Q My question is, you've told me now about</p> <p>17 the complaints that you've made to HR about unfair</p> <p>18 treatment.</p> <p>19 Have you told me all of them?</p> <p>20 A Yes. That is --</p> <p>21 Q I got it.</p> <p>22 A I can't -- and I never went to HR with the</p> <p>23 Carole thing. I didn't go to that because, again, I</p> <p>24 was at the point where I just wanted to be quiet,</p> <p>25 and I just wanted to -- again, I did what I thought</p>

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<p style="text-align: right;">Page 145</p> <p>1 I could do in order to keep myself -- my job and</p> <p>2 everything, which is why I tried to get off of</p> <p>3 International to bid for Domestic.</p> <p>4 Q You never complained to HR -- made any</p> <p>5 other complaints about discrimination --</p> <p>6 A No --</p> <p>7 Q -- or anything like?</p> <p>8 A -- I did not. I did not. I just -- I</p> <p>9 wanted some peace.</p> <p>10 Q I got it.</p> <p>11 All right. Back to travel benefits for a</p> <p>12 minute here. And we talked about a moment ago the</p> <p>13 potential for abuse, correct, of travel benefits?</p> <p>14 A Could I say something, one last thing?</p> <p>15 Q Let's keep going here. And then we'll --</p> <p>16 and then you can come back and correct anything that</p> <p>17 you need to correct.</p> <p>18 (Exhibit 12 was marked for</p> <p>19 identification.)</p> <p>20 BY MR. STONE:</p> <p>21 Q Let me show you what's been marked as</p> <p>22 Exhibit No. 12. And ask if you recognize that as a</p> <p>23 memo that went out to employees at Delta. It's</p> <p>24 addressed to Delta Colleagues Worldwide.</p> <p>25 A I don't know if I remember it. Oh, I</p>	<p style="text-align: right;">Page 147</p> <p>1 it; correct?</p> <p>2 A Yes, I'm pretty sure.</p> <p>3 Q All right.</p> <p>4 MR. STONE: Let's take a break for</p> <p>5 everybody. Why don't we take ten minutes here.</p> <p>6 (Brief break.)</p> <p>7 BY MR. STONE:</p> <p>8 Q Ms. Stevenson, we're back on the record.</p> <p>9 You realize you're still under oath;</p> <p>10 correct?</p> <p>11 A Yes, I do.</p> <p>12 Q All right. Okay. So we were talking</p> <p>13 about travel passes a moment ago. And you I know --</p> <p>14 I don't doubt recall that -- you have a recollection</p> <p>15 of being called in in July of 2015 for an interview</p> <p>16 regarding the use of travel passes by your travel</p> <p>17 companions; correct?</p> <p>18 A Yes. It wasn't an interview though. It</p> <p>19 was -- I was just told -- after I had got out of my</p> <p>20 briefing, my PL at the time said, Go put your stuff</p> <p>21 down. And then he was like, Just come back by my</p> <p>22 office in like 30 minutes.</p> <p>23 And I was like, Oh, for what?</p> <p>24 And he was like, he said, Just come back</p> <p>25 in 30 minutes. He was like, Honestly, I don't even</p>
<p style="text-align: right;">Page 146</p> <p>1 don't remember this because -- I said I accessed.</p> <p>2 But, I'll be honest, I don't remember this, because</p> <p>3 I was -- if I remember correctly, I was out on my,</p> <p>4 what do you call it, Workers' Comp thing. I was out</p> <p>5 at this time.</p> <p>6 Q Okay.</p> <p>7 A So if they sent it, like you said, to all</p> <p>8 employees, I'm sure it went to my e-mail. But I was</p> <p>9 out at that point, so I probably -- to answer</p> <p>10 honestly, I probably did not read this specific one.</p> <p>11 Q You would have received it, just not read</p> <p>12 it.</p> <p>13 A I would have received it, yeah. I'm sure</p> <p>14 they sent it to me.</p> <p>15 (Exhibit 13 was marked for</p> <p>16 identification.)</p> <p>17 BY MR. STONE:</p> <p>18 Q Let me show you Exhibit 13, which is a set</p> <p>19 of frequently asked questions that went with</p> <p>20 Exhibit 12, and see if that refreshes your</p> <p>21 recollection at all.</p> <p>22 A I think I remember this.</p> <p>23 Q You do remember that?</p> <p>24 A Yeah. I think I remember this.</p> <p>25 Q So you would have read it and understood</p>	<p style="text-align: right;">Page 148</p> <p>1 know what for. He was just like, We just have to go</p> <p>2 down to HR.</p> <p>3 And I said, Okay. Put my stuff down. Got</p> <p>4 back, 30 minutes, got back down. We walk in.</p> <p>5 And then Kiha got up off of -- from her</p> <p>6 desk. Came out. She's like, Hi, you know, Quaniah,</p> <p>7 I'm Kiha. We shook hands or whatever.</p> <p>8 And I said, Okay. Nice to meet you face</p> <p>9 to face finally.</p> <p>10 And then she's like, Oh, well, your --</p> <p>11 some travel passes, we're doing some audits, and she</p> <p>12 was like, Your name came up.</p> <p>13 I said, Oh, okay.</p> <p>14 And she's like, So I'm just going to ask</p> <p>15 some questions.</p> <p>16 And I was like, Okay. Fine.</p> <p>17 And me and my PL at the time, we sat down.</p> <p>18 And then she announced that somebody was on a</p> <p>19 speakerphone that would be listening in. They</p> <p>20 stated their name. And then we proceeded to go</p> <p>21 through whatever. But she called it like a -- but</p> <p>22 she didn't say interview.</p> <p>23 Q But they asked you a series of questions.</p> <p>24 A Oh, okay. That's what you mean, yeah.</p> <p>25 Q And so was your PL, your performance</p>

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1 leader, at that time was that Francisco Cortes?

2 A Yes.

3 Q And Mr. Cortes was somebody you obviously

4 liked, based on that tone of voice. Yes?

5 A Yes.

6 Q And he always treated you fairly.

7 A Yes, he did.

8 Q And he's the one you said took you down to

9 HR; correct?

10 A Uh-huh.

11 Q You have to say yes.

12 A Yes.

13 Q And when you got there, you said Kiha

14 Jones was there; correct?

15 A Yes, yes.

16 Q And then there was somebody that was on

17 the phone.

18 A She had them on the speaker phone. They

19 announced --

20 Q Do you remember what his name was?

21 A It was a she. And her name started with

22 an M.

23 Q Was it --

24 A And it was -- if I remember correctly, it

25 said Mehret. I don't remember the last name, but

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1 Mehret or Mehret.

2 Q Yep. Did you -- had you ever met Mehret?

3 A No. All I know is I -- just Mehret. I

4 think -- did she even say where she was -- I don't

5 even -- yeah, it was just she stated her name. I

6 don't know if she said -- I don't know if she gave

7 her title, but I just remember that name.

8 Q Did you have an understanding that she was

9 from the pass protection group or the audit group

10 that was responsible for ensuring compliance with

11 travel pass policies?

12 A I can't say I remember if that was

13 properly explained, like in that detail, the way you

14 just stated it. But definitely I was aware that

15 somebody was listening in, and that was her name.

16 Q Okay. Was Mehret just listening in, or

17 did she ask any questions?

18 A She more so was listening in. She did

19 ask -- it was more like when Kiha would say certain

20 stuff, she might bounce off of something Kiha might

21 have said or reiterate. Like so, you know -- it was

22 more like Kiha would ask the question, and Mehret

23 may say, So you're saying blah, blah, blah.

24 And I would, you know, give whatever my

25 response was.

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1 Okay. So I just was trying to be clear

2 on -- yeah, she asked a couple of questions. But

3 Kiha more so did the majority -- she did most of the

4 line of questioning for that particular --

5 Q And you -- I think we've established you

6 liked Kiha and thought she treated you fairly during

7 your employment. Yes?

8 A Well, here's the thing, I don't -- I --

9 no, I do -- I have to disagree with that.

10 Q Okay.

11 A I do not know her like that. My encounter

12 was not -- it wasn't the nicest encounter. I'll say

13 that. So, yeah, I have to say, yeah, I don't -- I

14 didn't have dealings with her like I had with other

15 people that I spoke on, so I can't really make that

16 assessment, other than it wasn't the nicest

17 encounter.

18 Q You're talking about the interview --

19 A Well --

20 Q -- on the passes. When you talk about

21 encounter, are you talking about this interview

22 we're talking about?

23 A I'm talking about the interview, and I'm

24 talking about a couple of e-mails back and forth

25 that she and I had before I ever even faced -- you

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1 know, face to face or whatever, just the tone, and

2 I -- yeah, the tone of them.

3 Q Okay.

4 A Yeah.

5 Q All right. Do you know who it was that

6 made the decision to -- I'm going to call it an

7 interview, to interview you?

8 A Just based off of what she said, was just

9 verbatim, I remember her stating, Your name came up.

10 It was never like, Oh, such and such said we need to

11 interview you.

12 It was just, Your name came up. You know,

13 we're doing audits or whatever, and so I'm going to

14 ask you some questions. This is -- do you know why

15 you're here?

16 And I preceded to say, No.

17 Okay. Well -- yeah, no.

18 Q Do you know -- when she said your name

19 came up, do you know who recognized your name coming

20 up and said, We need to interview Ms. Stevenson?

21 A Yeah, that was never made clear to me,

22 like this person said we need to -- it was just,

23 Your name came up.

24 Q Okay. Did you ever become aware that the

25 reason that your name came up in the investigation

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<p>Page 153</p> <p>1 was that you had given a buddy pass to somebody</p> <p>2 named Vendell Bailey.</p> <p>3 A You said the reason what? Could you say</p> <p>4 that again?</p> <p>5 Q Yeah. That the reason your name came up,</p> <p>6 did anybody ever tell you the reason your name came</p> <p>7 up was because you had given a buddy pass to</p> <p>8 somebody named Vendell Bailey?</p> <p>9 A No.</p> <p>10 Q Do you know who Mr. Bailey is?</p> <p>11 A Yeah. Well, the mother, I know the</p> <p>12 mother, yeah, I do know. But they never said --</p> <p>13 that never -- she never said, Oh, Vendell Bailey is</p> <p>14 why I'm talking to you. It was -- that was not --</p> <p>15 that wasn't even -- that came up later, but that</p> <p>16 wasn't the -- that wasn't the part -- that wasn't</p> <p>17 the reason for her really saying that she was</p> <p>18 talking to me.</p> <p>19 Q Well, she didn't tell you why she was</p> <p>20 talking to you, other than your name came up;</p> <p>21 correct?</p> <p>22 A Well, that, and then throughout the thing</p> <p>23 they got into my companion, and this is the reason</p> <p>24 why. And then she went so and so into other stuff</p> <p>25 that I guess I'll tell you later.</p>	<p>Page 155</p> <p>1 A No. I mean not like -- that's not --</p> <p>2 that's not a regular friend that I hang out with.</p> <p>3 Q I'm with you.</p> <p>4 A It's friends of the family.</p> <p>5 Q How did Mr. Bailey get a travel buddy pass</p> <p>6 that belonged to you?</p> <p>7 A Me.</p> <p>8 Q You gave it to him?</p> <p>9 A Uh-huh.</p> <p>10 Q When did you give it to him?</p> <p>11 A I do not recall that. That's the same</p> <p>12 thing I said to Kiha. I don't remember dates that I</p> <p>13 book my -- you know, we get more than one, so I</p> <p>14 don't -- I don't write -- yeah, I don't remember the</p> <p>15 date.</p> <p>16 Q Why did you give Mr. Bailey a buddy pass?</p> <p>17 A For pleasure travel to come from I</p> <p>18 think -- again, I don't -- I think Detroit to</p> <p>19 Atlanta, Atlanta to Detroit, which I stated that to</p> <p>20 Kiha as well. And I actually wrote it down.</p> <p>21 Q Did he ask you for a buddy pass?</p> <p>22 A Yes.</p> <p>23 Q How did he ask you?</p> <p>24 A Just, I need to fly.</p> <p>25 Q Did he call you? Did he text you? Did he</p>
<p>Page 154</p> <p>1 Q Do you -- you said you do not know Vendell</p> <p>2 Bailey personally?</p> <p>3 A Yeah, I know -- I do. I know that</p> <p>4 they're -- they're family friends of my family, and</p> <p>5 I stated that with Kiha.</p> <p>6 Q Tell me who Vendell Bailey is. He's a</p> <p>7 family friend?</p> <p>8 A No. He is the son of the mother.</p> <p>9 Q Okay. And who -- what's his mother's</p> <p>10 name?</p> <p>11 A That's Victoria.</p> <p>12 Q And how do you -- do you know Victoria?</p> <p>13 A Yeah, like --</p> <p>14 Q How do you know Victoria?</p> <p>15 A We're just friends, family friends.</p> <p>16 Q How long have you known her?</p> <p>17 A Now, maybe about seven years.</p> <p>18 Q But she doesn't work at Delta.</p> <p>19 A No.</p> <p>20 Q All right. And do you know Vendell as</p> <p>21 well?</p> <p>22 A Yes, that's her son.</p> <p>23 Q Have you met him and spoken with him?</p> <p>24 A Yes.</p> <p>25 Q Do you socialize with him?</p>	<p>Page 156</p> <p>1 write you?</p> <p>2 A No. It was just a phone call. It was</p> <p>3 actually a three-way call.</p> <p>4 Q Three-way call between who and who and</p> <p>5 who?</p> <p>6 A Mom.</p> <p>7 Q His mother Victoria?</p> <p>8 A Uh-huh.</p> <p>9 Q And yourself?</p> <p>10 A Yeah, yeah. I said, Hey, I'll book it.</p> <p>11 Q All right. Had you given him more than</p> <p>12 one buddy pass?</p> <p>13 A No.</p> <p>14 Q Did you ever give Victoria any buddy</p> <p>15 passes?</p> <p>16 A Uh-huh. I think I gave her like one</p> <p>17 before, like one or two before.</p> <p>18 Q All right. Do you know anybody named</p> <p>19 Ernest Adams?</p> <p>20 A Ernest Adams.</p> <p>21 Q Yes. Does that name mean anything to you?</p> <p>22 A No.</p> <p>23 Q Do you know anybody named Brady Nicholson?</p> <p>24 A No.</p> <p>25 Q Do you know anybody named Candice Dubois?</p>

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1 A That's my coworker -- well, I'm not there
2 right now. That's my coworker.
3 Q She used to be a coworker of yours?
4 A No, she works at Delta.
5 Q What about Sedarius Johnson?
6 A I don't know. I think some of these --
7 these people, I think they work at Delta. I think
8 so. I definitely know Candice, yeah, because she's
9 on my Facebook too.
10 Q Is she friends with you?
11 A She just sent me a nice little message the
12 other day, commented on something. I don't know.
13 Q Is she friends with Victoria Bailey?
14 A I -- I don't know if --
15 Q Do you know of any way that she would know
16 Victoria Bailey?
17 A I -- again, I don't know. I -- some of my
18 Facebook people that Delta follow. Some of the
19 people that are my personal friends, that they're
20 friends on Facebook. I don't know if Candice is
21 friends with her. But that's my coworkers.
22 Q Do you know any of the people I just
23 listed, Mr. Adams, Mr. Nicholson, Sedarius Johnson
24 or Candice Dubois or Dubois, are friends with
25 Vendell Bailey?

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1 A No, I do not -- I do not know who else --
2 Q Do you know if any --
3 A I know she has other friends there, but I
4 don't -- no, I don't.
5 Q Do you know if any of those people would
6 be friends with Victoria or Vendell Bailey?
7 A I do not.
8 Q Okay.
9 A I am, but I don't know, you know.
10 Q Do you know of any reason that any of
11 those people would give buddy passes to Victoria or
12 Vendell Bailey?
13 A No. But I mean Candice like -- what I
14 will say is like we've given each other passes
15 before, like -- like I've made -- we've stated that.
16 Like I stated that to Kiha and to supervisors
17 like -- to my understanding, even per the
18 supervisors, like if your coworker is your -- like
19 if we're friends or whatever, and somebody says,
20 Hey, you know, I'm out of mine. You know, my aunt
21 needs to fly tomorrow. Is it okay for my aunt to --
22 you know, if you have an extra one.
23 Yeah, you know, I have an extra one.
24 I don't know. Correct me if -- at the
25 time, correct me if I'm wrong but -- and I stated

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1 this to Kiha. I was like, you know, people -- if
2 we're friends with each other, you're coworkers,
3 I've had several performance leaders say, Yeah, you
4 know, if you're friends with the person, you're free
5 to give them to -- as long as it's for pleasure.
6 And I made that real clear, like --
7 Q All right.
8 A -- pleasure travel.
9 Q Did you -- are you telling me that people
10 gave you passes to give to Vendell Bailey?
11 A No. I'm not saying that. I'm just making
12 that analogy that --
13 Q So you don't --
14 A -- I was told that we're allowed to -- as
15 long as it's not for purchase, payment, you know,
16 that -- you're okay with that, as long as you're
17 not -- it's personal travel, and you are not
18 receiving any money.
19 Q All right. Just to be clear, you don't
20 know of any reason why any of those people would
21 give buddy passes to Vendell Bailey, as you sit
22 here?
23 A I don't know. I don't know if they know
24 her or him or whatever.
25 Q All right. You were asked during the --

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1 I'm again calling it an interview?
2 A Yeah. She asked me that in the interview.
3 Q And you told her what you just told me?
4 A Yeah. I told her like -- well, she didn't
5 ask me about Candice now. I don't think she --
6 yeah. I don't remember her asking me about Candice
7 at all.
8 Q But you told her that you had given a
9 buddy pass to Vendell -- to Victoria Bailey and
10 Vendell Bailey?
11 A Yeah. I think I actually wrote it out for
12 her too.
13 Q You also spent considerable time talking
14 about Mr. Dais; correct?
15 A Yeah, that -- that's what I was -- that
16 was pretty much -- that's why -- that was the whole
17 point of her conversation with me.
18 Q And Mr. Dais, as we've established a
19 moment ago, was your travel companion at the time;
20 correct?
21 A Uh-huh.
22 Q You have to say yes.
23 A Yes.
24 Q And he was also your boyfriend; correct?
25 A Yes.

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1 Q And he was not your travel companion
2 during the entirety of your employment at Delta, was
3 he?
4 A No. It was one -- it was one time I had
5 one other person on there. And I made that clear to
6 her as well. We --
7 Q That was Christopher Blanding?
8 A Christopher Blanding, uh-huh, for that
9 short period of time.
10 Q And who was Mr. Blanding?
11 A He actually is a long-time friend that I
12 know for a long, long time and -- I've just known
13 him for a long time. We worked together. We've
14 done music together, yeah.
15 Q And how long was Mr. Blanding your travel
16 companion?
17 A Just that one year.
18 Q And why did you take Mr. Dais off and make
19 Mr. Blanding your travel companion?
20 A Because we had -- we broke up for a little
21 bit, until we got back together.
22 Q Got you.
23 And how did -- how is it that among
24 your -- all your friends and all your family members
25 Mr. Blanding was the person who got the benefit of

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1 that pass?
2 A Oh, that -- I mean we've been friends for
3 a long time. Like we've just been friends for a
4 very, very, very long time.
5 Q And how did you come to choose him? Did
6 he ask?
7 A No. I just -- I was real clear on he
8 wasn't on there no more. We broke up. Hey, you
9 want to fly?
10 Cool.
11 Act like you've got some sense, you know,
12 it's pleasure. And I don't even think he even flew
13 that much so --
14 Q Mr. Blanding is in the music production
15 business, like --
16 A Yes, he is.
17 Q Just like Mr. Dais; correct?
18 A Uh-huh. That is his job.
19 Q Did you ever work for him?
20 A I didn't work for him. We just worked
21 together. We did a lot of -- a lot of work
22 together.
23 Q What kind of work did you do together?
24 A Just music, a lot of music.
25 Q Were you working together during the year

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1 that he was your travel companion?
2 A Yes, uh-huh.
3 Q And when you say a lot of music, tell me
4 what work you did together.
5 A I mean like I would -- I sing, you know, I
6 just -- I sing. Like if he needed to record
7 something. We did a lot of singing.
8 Q So he would hire you to record stuff?
9 A Well, it's -- I don't want to say
10 necessarily hire, Ben, because he's a friend so --
11 and he does something that I love, which is music.
12 So he could just call me and say, Hey, you know, I'm
13 going to e-mail you some music. Can you sing it for
14 me? And I -- or can you write it, because I'm a
15 writer too.
16 And I'd say, Okay.
17 Q Well, I assume he'd paid you something for
18 doing that. Yes?
19 A No, no.
20 Q He didn't?
21 A No. I'm being honest, no, because we go
22 back 20 years. Like we've known each other for a
23 long time. So I just -- I would just do it for him
24 because that's -- we're cool. We're cool like that.
25 Q So all the work you did, the singing and

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1 the writing was all done for free?
2 A Oh, if it wasn't, I probably would be a --
3 it was -- it was done for free. I have not made
4 anything with him.
5 Q So when I ask Mr. Blanding that question,
6 he'll testify that he's never paid you any money for
7 anything that he's done?
8 A Absolute -- you need my mother here on
9 that one. Absolutely not.
10 Q And then what caused you to take
11 Mr. Blanding off as your travel companion and
12 begin --
13 A We started back talking. We --
14 Q You and Mr. Dais?
15 A Yes, we did --
16 Q Okay.
17 A -- we did.
18 Q And during the July 15th interview, you
19 were asked about the places that Mr. Dais had
20 traveled; correct?
21 A Uh-huh.
22 Q And you identified three; correct?
23 A Here's the thing. Well, I don't know how
24 that is in your paperwork. I wouldn't -- I did not
25 identify three. I was real clear, Ben, with Kiha

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1 that -- as she was asking me a lot of questions just
2 back to back, you know, unexpected me, I -- I can't
3 clearly say that I could just sit there and just say
4 every single place that I had ever booked him to.
5 And I was honest with her. I said, you know, I -- I
6 wrote down what I could write down, but I'm in the
7 middle of my workday. As a matter of fact, the day
8 that I was there, I was working for somebody.

9 Q How many did you identify for Ms. --

10 A I'll be honest, and I'm not -- I don't
11 have that piece of paper, but I know you might have
12 it. I actually wrote down a number of the places,
13 and I gave her that before we left out the day. And
14 then she says, Well, I'm going to suspend your --
15 when I came back in, because they had me --

16 Q I haven't asked you any of this.

17 A Oh, okay.

18 Q Ms. Stevenson, again, I'm begging you,
19 answer my question.

20 A Oh, because I think it's pertinent to what
21 you're asking me.

22 Q I am asking you -- listen real hard to my
23 question, and answer my question. I promise you
24 this will go faster.

25 You're in the interview. You were asked

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1 by Kiha to name the places where Mr. Dais had
2 traveled; correct?

3 A Right.

4 Q And you identified -- at that meeting you
5 identified three places; correct?

6 A I can't say that I can remember if it was
7 three. I really -- I think that I remember it might
8 have been more. It could have been less than that.

9 But as I stated to her, I said, I don't
10 remember back in '07.

11 And then she correct me, she said, I don't
12 need to -- you don't even have to go that far back.
13 I don't -- I know you probably don't -- I don't. I
14 don't remember even -- at the spur of the moment
15 like that she was asking me. And I stated it to her
16 like that.

17 And she agreed. She said, I don't
18 expect -- I don't expect you to remember every place
19 back from 2010-07.

20 I said, I'm in '15 -- well, at the time,
21 yeah, '15. I don't remember. I just feel like I
22 was blindsided, again, wrongly. I just -- I feel
23 like it was very unfair.

24 Q Do you remember being asked the last place
25 that Mr. Dais had traveled?

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1 A To be honest, Ben, again, that was two
2 years ago, I do not remember all of the line of
3 questioning she asked me. She probably did ask me
4 that. If I remember correctly, I might have said, I
5 don't know, Phoenix or California, you know,
6 because -- and then -- well, I guess that will be on
7 the -- because I know all of that, so you probably
8 going to get to that in a minute, so I'll just --

9 Q Do you remember being asked who booked
10 Mr. Dais's travel?

11 A Yes, I do. She did ask me that.

12 Q And what was the answer to that question?

13 A Myself.

14 Q You booked all of his travel.

15 A Yes. I did state that to Kiha, uh-huh.

16 Q Okay. And how did you do all of -- book
17 all of his travel?

18 A Did I -- I guess from my phone sometime,
19 you know, if I'm -- like, you know, through e-mails
20 or just -- like we go on the TravelNet. You can --
21 you have to go on the TravelNet and book the flight.

22 Q So let me be -- let me be perfectly -- let
23 me make sure I understand.

24 So Mr. Dais would contact you, and say, I
25 need a flight from -- on X day to X place?

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1 A Yeah, or like if he got -- sometimes if he
2 would get stuck somewhere, I could be in the middle
3 of my shift or something. Like I'll say, Hey, I'll
4 have to check my -- hey, I'm at work right now. I
5 can't talk. Call you on a break.

6 You know, I'm stuck in the airport. I
7 need to be booked blah, blah, blah, or I need a --
8 to get out of California, to get back.

9 So then I'd say, Hey, let me hit you back
10 on a break. I'm in the middle of my shift. And on
11 a break I would sometimes go and say, hey, look at
12 the flights on my break, like you could. And I
13 stated all this to Kiha. And I'd say, Hey, I just
14 booked from the Atlanta connecting in Phoenix,
15 Phoenix to -- I'm just throwing something out there,
16 like wherever, Philadelphia back through Orlando,
17 Orlando, however. And I'd tell him you've got to
18 take that route now. And I'd just send to him and
19 send his confirmation.

20 Q And this would be by text? Is that how
21 this would typically take place?

22 A Sometimes, yes, text message. I still
23 would have to go on --

24 Q On the DeltaNet.

25 A Yeah, go into the -- into my DeltaNet.

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<p style="text-align: right;">Page 169</p> <p>1 Q So when I check the text records and when</p> <p>2 I check the cell phone records, I'll see</p> <p>3 confirmation of all of them. Yes?</p> <p>4 A Yes, yeah.</p> <p>5 Q All right. Did he -- strike that.</p> <p>6 You were asked during the interview</p> <p>7 whether you and Mr. Dais had ever traveled together;</p> <p>8 correct?</p> <p>9 A I'm so glad you asked me that. Yes.</p> <p>10 Q And you said -- the answer to that</p> <p>11 question was yes; correct?</p> <p>12 A No.</p> <p>13 Q So you did not tell Delta you had traveled</p> <p>14 together.</p> <p>15 A I was really clear to Kiha that we had not</p> <p>16 traveled. There was a moment right in that section</p> <p>17 where Mehret, whatever her name is, I think it's --</p> <p>18 Mehret and her were kind of overlapping each other</p> <p>19 talking. And Kiha was like, Wait a minute, let me</p> <p>20 ask you again. And she said something. She's like,</p> <p>21 So which one is it? Are you trying to --</p> <p>22 And I said --</p> <p>23 So yes you took --</p> <p>24 No. I'm not saying that we traveled</p> <p>25 together. We were just there around that same time,</p>	<p style="text-align: right;">Page 171</p> <p>1 I said, Yes, he does. He's a resident.</p> <p>2 Q You're answering much more than my</p> <p>3 question.</p> <p>4 My question is, did the topic of a funeral</p> <p>5 come up?</p> <p>6 A Yes, the funeral came up. And she asked</p> <p>7 me, she said, So he went to the funeral with your --</p> <p>8 with you and your aunt.</p> <p>9 I said, Absolutely not. He was there</p> <p>10 doing something else. I said, I was at my aunt's</p> <p>11 funeral. We've never traveled together. I said</p> <p>12 that like two or three time. I said, Kiha --</p> <p>13 Q How did the topic of a funeral first come</p> <p>14 up, Ms. Stevenson?</p> <p>15 A I'll be honest, I don't even remember how</p> <p>16 that came up. I might have said it myself because</p> <p>17 that was my aunt.</p> <p>18 Q So you said that you -- so you were asked</p> <p>19 whether or not you had traveled with Mr. Dais, and</p> <p>20 you raised the topic of the funeral?</p> <p>21 A I'll be honest, I don't remember what the</p> <p>22 line of questioning was. But I do remember stating</p> <p>23 to her, My father -- I mean we had never traveled</p> <p>24 together. That was me and my father.</p> <p>25 Q So you and Mr. Dais are --</p>
<p style="text-align: right;">Page 170</p> <p>1 which was in California at the time.</p> <p>2 And she asked me again. I said, I'm being</p> <p>3 clear. We have never traveled together.</p> <p>4 Q Did you tell Delta and those interviewers</p> <p>5 that you and Mr. Dais had gone to a funeral?</p> <p>6 A No.</p> <p>7 Q You never -- did the word funeral ever</p> <p>8 come up?</p> <p>9 A Funeral did come up. I was real clear</p> <p>10 about that.</p> <p>11 Q What did you say?</p> <p>12 A That he was out there for -- he's a dual</p> <p>13 resident. At the time, the Mehret person is like,</p> <p>14 Well, because I kind of know everything because I</p> <p>15 follow him.</p> <p>16 And I said, Okay.</p> <p>17 I follow him all the time on Twitter and</p> <p>18 his Instagram. I see everything that he does.</p> <p>19 And I -- again, I don't know what's going</p> <p>20 on here, Ben. I wasn't prepared for it. I said,</p> <p>21 Okay. So, you know, what are you saying?</p> <p>22 Well, you know, I see he goes for shows.</p> <p>23 I said, Well, that's pleasure. I said,</p> <p>24 But he lives there.</p> <p>25 No, he doesn't live there.</p>	<p style="text-align: right;">Page 172</p> <p>1 A But they did --</p> <p>2 Q -- boyfriend and girlfriend; correct?</p> <p>3 A Uh-huh, uh-huh.</p> <p>4 Q And Mr. Dais is your travel companion;</p> <p>5 correct?</p> <p>6 A Uh-huh, uh-huh.</p> <p>7 Q And Mr. Dais does a great deal of travel;</p> <p>8 correct?</p> <p>9 A Yes.</p> <p>10 Q And you guys have never once, even though</p> <p>11 he's your travel companion --</p> <p>12 A (No response, indicating.)</p> <p>13 Q Can you explain why?</p> <p>14 A Why? I mean --</p> <p>15 Q Why have you never traveled together?</p> <p>16 A We just have not. And I -- Kiha, she</p> <p>17 asked me, and I said we didn't. And we've dated for</p> <p>18 a very long time.</p> <p>19 Q You were asked, were you not, about</p> <p>20 Mr. Dais's trip that he took in early June of 2015</p> <p>21 to --</p> <p>22 A I was asked what?</p> <p>23 Q About Mr. Dais's trip to California in</p> <p>24 early June of 2015.</p> <p>25 A Yeah. I think she asked me that. That</p>

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<p style="text-align: right;">Page 173</p> <p>1 was the one where Mehret was like she follows him, 2 she follows my boyfriend -- 3 Q Okay. 4 A -- on Twitter. 5 Q And why did you -- 6 A And I was real clear about something with 7 that. 8 Q Why did Mr. Dais go out to California in 9 early June of 2015? 10 A Here's the thing, I do not know because I 11 didn't -- as I stated to her, I said, I don't know 12 because I don't keep -- 13 Well, I'm going to tell you. This is what 14 the Mehret lady said. Well, I'm telling you, well, 15 he went for some shows. 16 Well, he goes for fun. People -- he goes 17 to shows. He goes to concerts. I did state that to 18 her. 19 Q All right. You don't know why he went in 20 June of 2015. 21 A I only know what Kiha and Mehret told me. 22 Q You've never asked Jovan that question? 23 A No. I'm being honest with you, I -- as I 24 said to Kiha, and I even sent her an e-mail, I said, 25 I cannot account for -- I was -- because I'm going</p>	<p style="text-align: right;">Page 175</p> <p>1 career. That I take and I took seriously, and this 2 was my livelihood. And I -- 3 Q How do you know? 4 A Well, it's kind of like -- like I think I 5 might have said to Kiha then it's like, Do you know 6 where your husband is every five minutes, like -- 7 because, you know, I'm not married yet, but I would 8 like to know somebody who knows where their spouse 9 is 24 hours a day. Most people don't these days. 10 Q You -- 11 A I said that. I'm just saying, I don't 12 know. 13 Q Okay. 14 A And I was honest with her. She was like, 15 Okay. 16 And then I asked her a question, I said, 17 so am I supposed to know -- 18 Well, yeah, you're supposed to know when 19 they leave the airport. I remember that being -- 20 I said, How am I supposed to know, you 21 know, that they went and got a hamburger when they 22 left the airport. I mean I didn't say that -- that 23 part. I'm just -- 24 Q Well, you understand you were responsible 25 for ensuring --</p>
<p style="text-align: right;">Page 174</p> <p>1 real personal, and I didn't even want to go 2 personally. Like I told her, I -- our 3 relationship -- like we just -- I don't -- I told 4 her -- we don't -- I don't -- he's a different kind 5 of guy. Musicians are -- like I don't really get 6 into where you at, what -- I'm just -- and 7 everything I'm saying to you right now, Ben, I said 8 it the way -- that I said it to Kiha, I'm saying it 9 to you. 10 Q You have no -- 11 A I don't question him and say -- all I know 12 is act like you got -- everybody act like you have 13 some sense. This is pleasure. Enjoy this. It's a 14 benefit, key word benefit. Don't give the gate 15 agent any problems, which that has never occurred or 16 anything. 17 Q So you don't -- 18 A I just never -- I didn't -- and I told 19 Kiha, I said, I know that I booked his travel for 20 pleasure. I said that maybe six times during the -- 21 Q How do you know that, if you don't know 22 why he was going? 23 A Because I know he was going for pleasure. 24 Q How do you know? 25 A Because he knows -- he knows this is my</p>	<p style="text-align: right;">Page 176</p> <p>1 A Right. 2 Q -- they complied with Delta policy; 3 correct? 4 A I did. And, like I said -- 5 Q And -- 6 A -- whenever I book it, and I said this to 7 her, I said, I'm booking it, and it's for pleasure. 8 Well, I didn't have to say that to my people because 9 they understand. My friends and family know. When 10 my parents flew they know, hey, you're flying for 11 pleasure. 12 Q But you don't know whether Jovan was doing 13 that or not. He might have been going for business. 14 You don't know. 15 A No, he was not going for business. 16 Q How do you know? You don't know what he 17 was doing there. 18 A He wasn't. He -- 19 Q How do you know? 20 A He -- he was going for business -- I mean 21 he was going for pleasure, I'm sorry, correct me. 22 He was going for -- 23 Q How do you know -- 24 A -- pleasure. 25 Q You don't know what he was doing there?</p>

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1 A I was really clear with Kiha that he's
2 always going for pleasure.
3 Q How do you know that he wasn't traveling
4 for business in June of 2015?
5 A Ben, I --
6 Q You don't.
7 A Ben. I don't know what nobody is doing
8 for -- I'm just saying when they -- I don't know
9 what anybody is doing, let's just be clear, if I'm
10 not with him 24 hours a day. I said that to Kiha.
11 But I know he was traveling for pleasure when I
12 booked the trip. And I said that to Kiha.
13 Q Well, how do you know -- you don't know
14 what he was doing in California; right?
15 A Well, I know he has a daughter there, and
16 he's a dual resident. And I made that clear. And,
17 at the time, Mehret said, No, he doesn't --
18 Q Ms. --
19 A -- but he does.
20 Q Ms. Stevenson, stop.
21 A It's not for business.
22 Q You don't know what --
23 A No. I do know he has a daughter.
24 Q Stop. You don't know on this particular
25 trip --

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1 A Oh, you're talking about that trip.
2 Q Right. You don't know what he was doing
3 out there, do you?
4 A He was out there for pleasure.
5 Q How do you know?
6 A According to Mehret, and whatever she
7 stated that she saw, it clearly shows pleasure.
8 Q What do you -- what was he doing out
9 there?
10 A She says a show. He wasn't doing a show.
11 People go to concerts for pleasure. I mean I go to
12 other states and go to a concert for pleasure. Like
13 you can't go to a concert for pleasure?
14 Q Ms. Stevenson, let me ask you a question.
15 You've never talked to him about what he
16 was doing in California; right?
17 A I mean after all of this happened or
18 whatever, and he thought -- he was like, What do you
19 mean? I always travel for pleasure. And he's a
20 dual resident.
21 Q Stop. You never talked to him -- listen
22 to my --
23 A Yes, I said afterwards. Yes, we had -- we
24 did talk about it.
25 Q What was he doing in California on this

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1 trip?
2 A He was there for pleasure and to see his
3 daughter. I made -- I said that to Kiha.
4 Q So he saw his daughter out there?
5 A Yes. And --
6 Q How long was he out there?
7 A I mean he goes back and forth. I'll be
8 honest, I don't calculate, oh, he came back in five
9 day, four days. He's a dual resident there, and his
10 daughter -- his little girl lives there.
11 Q How long was he out there on this
12 particular trip?
13 A I do not know. I could ask him how long
14 he was there.
15 Q But you never asked.
16 A Because Kiha didn't ask me that. She
17 didn't ask me. I don't think she asked me -- she
18 never asked me how long. But, yeah, I mean it's
19 emotional because that's his little girl.
20 Q You don't know what he was -- how many
21 days he was out there or what he was doing, do you?
22 A Well, I never ask him how long he's
23 staying or nothing like that, Ben. I mean I'm just
24 being honest, I don't. Because he has a little girl
25 out there. I'm not the child's mother.

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1 Q Okay. I want to be perfectly clear.
2 You don't have any personal knowledge of
3 what he was doing --
4 A I do now.
5 Q -- on that trip.
6 A I'm saying based off of -- I'm being
7 clear. I have -- the only knowledge I have is -- of
8 course we talked about it after all of the charades.
9 But based off of what Mehret and Kiha stated to me,
10 a bunch of bologna. Like I know why he was there.
11 Q Stop.
12 A I don't, other than what they told me. I
13 know what --
14 Q You don't --
15 A I'm saying all I -- what I know -- what I
16 know is what Kiha and Mehret told me. That's all I
17 know. Because they gave me the reason. Because
18 that part of the question came up. They said, You
19 know what, we're going to tell you why he was there.
20 He was there for a show. But it wasn't his show. I
21 made that clear. And she's like, Okay. Well, we're
22 telling you --
23 Q How do you know it wasn't his show?
24 A I'm saying that's what they -- they said
25 to me a show. So I'm saying when I think show,

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<p>Page 181</p> <p>1 people go to shows. I know they go to shows and</p> <p>2 concerts.</p> <p>3 Q Ms. Stevenson, we've gone around and</p> <p>4 around on this.</p> <p>5 A Because when he's on tour --</p> <p>6 Q Let me be perfectly clear.</p> <p>7 A -- he's on a bus.</p> <p>8 Q All you know is what Kiha --</p> <p>9 A What they told me.</p> <p>10 Q -- and Mehret told you.</p> <p>11 A Uh-huh.</p> <p>12 Q You don't know any -- you don't have any</p> <p>13 other information as to what he was doing out there</p> <p>14 in California on that trip.</p> <p>15 A Well, other than what they told. She said</p> <p>16 she saw --</p> <p>17 Q Other than what they told you, you don't</p> <p>18 have any other knowledge.</p> <p>19 A Other than what she also said to me</p> <p>20 online, because they sent me something online.</p> <p>21 That's what I'm saying. I know that part.</p> <p>22 And it's all what Kiha and Mehret -- she</p> <p>23 says she follows -- I follow your boyfriend.</p> <p>24 I said, Okay.</p> <p>25 Q Other than what they told you --</p>	<p>Page 183</p> <p>1 do you know -- how can you show us -- you know,</p> <p>2 well, you need to provide something for that, which</p> <p>3 eventually that came up, and I had to provide that.</p> <p>4 Q Did he spend much time with his daughter</p> <p>5 on that trip; do you know?</p> <p>6 A I'll be honest, when he's out there,</p> <p>7 according to what -- you know, what I can see, as</p> <p>8 far as like a picture in his phone, he -- he tends</p> <p>9 to -- when he's there, he spends a lot of time</p> <p>10 with --</p> <p>11 Q And that would have been true in this June</p> <p>12 trip? He spent a lot of time with her?</p> <p>13 A I mean -- again, I would hope he did. I</p> <p>14 would hope he saw her. That's what I -- that's the</p> <p>15 thing I told you I wrote --</p> <p>16 Q So you don't know whether he actually saw</p> <p>17 her or not.</p> <p>18 A No. He saw his daughter. I'm sure he --</p> <p>19 Q For how long?</p> <p>20 A I didn't ask him, Ben.</p> <p>21 Q How do you know he saw his daughter?</p> <p>22 A He saw his -- no. I mean he saw his</p> <p>23 daughter. You're asking me the time. That's not</p> <p>24 fair.</p> <p>25 Q All he told is he --</p>
<p>Page 182</p> <p>1 A Uh-huh.</p> <p>2 Q -- and what you saw online, and we'll look</p> <p>3 at that in a minute --</p> <p>4 A Uh-huh.</p> <p>5 Q -- you don't have any other source of</p> <p>6 knowledge of what he was doing there.</p> <p>7 A No, other than what he's told me.</p> <p>8 Q Okay. What specifically did he tell you?</p> <p>9 A He was out there for pleasure and to see</p> <p>10 his daughter.</p> <p>11 Q Okay. That's what he told you?</p> <p>12 A Yeah. I told Kiha that.</p> <p>13 Q What pleasure was he out there for?</p> <p>14 A I mean I don't -- again, I don't -- I</p> <p>15 don't -- I don't ask him, Oh, did you and your</p> <p>16 friends go to the bar? Where was you at? I'm</p> <p>17 not -- I never -- I'm not that type of woman. I</p> <p>18 don't -- where you at, why --</p> <p>19 Q So he only told you two things. He was</p> <p>20 out there for pleasure, and he saw his daughter.</p> <p>21 Is that all he told you?</p> <p>22 A Yeah. He was out there for -- yeah, I</p> <p>23 told Kiha that. Pleasure, he saw his daughter.</p> <p>24 He's a dual resident. I said that as well.</p> <p>25 And Mehret at the time was like, Well, how</p>	<p>Page 184</p> <p>1 A It's not fair. It's not fair. Yeah, he</p> <p>2 saw -- believe me, he's not -- he's a good father.</p> <p>3 I'd like to have a baby. He's not -- he's not not</p> <p>4 going to go to California and not see -- that's his</p> <p>5 baby girl. That's his baby girl.</p> <p>6 Q How old is his daughter?</p> <p>7 A Imari is -- I think she's 14. She should</p> <p>8 be about 14 now.</p> <p>9 Q But other than him telling you that, you</p> <p>10 don't know if he was telling you the truth or not.</p> <p>11 A No. I know he was telling the truth. But</p> <p>12 I know Mehret wasn't aware that he had a third</p> <p>13 daughter, but she was aware that he had two other</p> <p>14 daughters.</p> <p>15 Q How do you know he was telling you the</p> <p>16 truth?</p> <p>17 A What, that he saw his daughter?</p> <p>18 Q (No response, indicating.)</p> <p>19 A He saw his daughter.</p> <p>20 Q How do you know he told you the truth?</p> <p>21 A I'm not a psychic.</p> <p>22 Q You don't know.</p> <p>23 A I'll just say I'm not psychic.</p> <p>24 Q So you don't know. He might have --</p> <p>25 A He tells me he sees -- he sees his</p>

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<p style="text-align: right;">Page 185</p> <p>1 daughter.</p> <p>2 Q All right.</p> <p>3 A He better.</p> <p>4 (Exhibit 14 was marked for</p> <p>5 identification.)</p> <p>6 BY MR. STONE:</p> <p>7 Q Let me show you what's been marked as</p> <p>8 Exhibit 14.</p> <p>9 You mentioned that you --</p> <p>10 A Yeah, I wrote this.</p> <p>11 Q That's your written statement that you</p> <p>12 provided.</p> <p>13 A Uh-huh. This is my handwriting.</p> <p>14 Q Okay. Did you --</p> <p>15 A I was asked to write that like right then</p> <p>16 and there. So, again, I wrote as fast as I could.</p> <p>17 Q Did you provide any written statement</p> <p>18 other than Exhibit 14?</p> <p>19 A No, this is all. This is all that I gave</p> <p>20 that particular -- like I said, while I was in there</p> <p>21 with Frank Cortes.</p> <p>22 (Exhibit 15 was marked for</p> <p>23 identification.)</p> <p>24 BY MR. STONE:</p> <p>25 Q And then let me show you Exhibit 15, and</p>	<p style="text-align: right;">Page 187</p> <p>1 Q Mr. Dais is a producer, and Mr. Boyette is</p> <p>2 an artist; correct?</p> <p>3 A Yes, he is an artist.</p> <p>4 Q All right. And Mr. Dais also goes online</p> <p>5 by a name -- by the name -- I'm sorry -- strike</p> <p>6 that.</p> <p>7 A Yeah, Jino. You said --</p> <p>8 Q Yeah. Mr. Boyette also goes by the name</p> <p>9 Jino, J-I-N-O.</p> <p>10 A Uh-huh.</p> <p>11 Q Yes?</p> <p>12 A Yes. That's his rap name.</p> <p>13 Q All right. And you're aware that on the</p> <p>14 particular trip we've been talking about, the</p> <p>15 June 2015 trip, that the reason for the trip was</p> <p>16 that Mr. Boyette was performing?</p> <p>17 A Wait a minute. Who said what? Can you</p> <p>18 say that again?</p> <p>19 Q Sure. That the reason for the trip that</p> <p>20 Mr. Dais and Mr. Boyette took to California in June</p> <p>21 of 2015 was because Mr. Boyette was performing.</p> <p>22 A Okay. You're asking me that, or you're</p> <p>23 telling me that.</p> <p>24 Q I'm asking if you're aware of that fact.</p> <p>25 A Like I said to Kiha, when I -- when I</p>
<p style="text-align: right;">Page 186</p> <p>1 ask you if that's an e-mail that you sent. And it's</p> <p>2 an e-mail you would have sent to --</p> <p>3 A Yeah. I think --</p> <p>4 Q -- Kiha Jones?</p> <p>5 A Yeah, I think. I'll just reread it. Just</p> <p>6 looking at the top of it, I think I remember. Yeah,</p> <p>7 that's what I was saying. I did send this. I do</p> <p>8 not have -- yep, uh-huh.</p> <p>9 Q All right.</p> <p>10 A Yeah.</p> <p>11 Q You're aware that on this particular trip</p> <p>12 that we've been talking about, this June 2015</p> <p>13 trip --</p> <p>14 A Uh-huh.</p> <p>15 Q -- that Mr. Dais traveled with a gentleman</p> <p>16 named Caleb Boyette; correct?</p> <p>17 A Yes, she told me.</p> <p>18 Q And Mr. Boyette is a client of Mr. Dais;</p> <p>19 correct?</p> <p>20 A No, not a client. Actually, a friend.</p> <p>21 They're friends. And they work together -- they</p> <p>22 work together, and they're friends. Yeah, they do.</p> <p>23 Q He helps -- Mr. Dais helps Mr. Boyette</p> <p>24 with his music business; correct?</p> <p>25 A They do music together, yes.</p>	<p style="text-align: right;">Page 188</p> <p>1 booked the trip, it is for pleasure. It is not for</p> <p>2 anybody to go make money or anything like that. I</p> <p>3 was real clear on that.</p> <p>4 Q That's not -- that doesn't answer my</p> <p>5 question.</p> <p>6 Are you aware that the reason for the trip</p> <p>7 is that Mr. Boyette was performing in a concert?</p> <p>8 A No. And, like I said -- no. Like I</p> <p>9 stated, Ben, you asked me the question, I'm giving</p> <p>10 the answer that I gave to Kiha. It was for</p> <p>11 pleasure. They go to shows. They go to concerts.</p> <p>12 There's no compensation. Clearly, there's no</p> <p>13 compensation --</p> <p>14 Q So Mr. Boyette --</p> <p>15 A -- because I know their financial.</p> <p>16 There's no compensation.</p> <p>17 Q Well, Mr. Boyette was performing in this</p> <p>18 show; correct?</p> <p>19 A Like I stated to Kiha, it's for pleasure.</p> <p>20 They --</p> <p>21 Q Ms. Stevenson --</p> <p>22 A -- go to the club.</p> <p>23 Q -- enough. You're playing a game here.</p> <p>24 A I'm not --</p> <p>25 Q I'm asking you a very simple question.</p>

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<p style="text-align: right;">Page 189</p> <p>1 A Ben, I'm not --</p> <p>2 Q Stop.</p> <p>3 A Ben, I'm not --</p> <p>4 Q I'm asking you --</p> <p>5 A You're telling me how to answer.</p> <p>6 Q -- a very simple question.</p> <p>7 A You can't tell me how to answer. I'm</p> <p>8 hearing your question. But I'm saying I've giving</p> <p>9 you the same -- it's the truth. This is the same</p> <p>10 thing that --</p> <p>11 Q No, it's --</p> <p>12 A -- I said to Kiha. This is not a game for</p> <p>13 me. This has been my life and my career. And I</p> <p>14 don't play with that. I may look like I'm 21 --</p> <p>15 Q Ms. Stevenson --</p> <p>16 A -- or 20 --</p> <p>17 Q -- stop.</p> <p>18 A -- but I'm a grown woman.</p> <p>19 Q Stop.</p> <p>20 A And this is my life. I'm not playing with</p> <p>21 my career --</p> <p>22 Q Ms. Stevenson --</p> <p>23 A -- to be blindsided.</p> <p>24 Q -- we're going to get the judge on the</p> <p>25 phone in a minute.</p>	<p style="text-align: right;">Page 191</p> <p>1 Q Ms. Boyette --</p> <p>2 A It's for --</p> <p>3 Q -- Ms. Stevenson --</p> <p>4 A I don't think it's funny. This has been</p> <p>5 my life and my career that's been turned back upside</p> <p>6 down.</p> <p>7 Q Ms. Stevenson --</p> <p>8 A And I was -- I've been a very -- a great</p> <p>9 employee above and beyond when I was there.</p> <p>10 Q Ms. Stevenson, the judge is going to read</p> <p>11 this transcript, and she's going to be very troubled</p> <p>12 by it.</p> <p>13 A Well, why is she going to be troubled --</p> <p>14 Q Because you're --</p> <p>15 A -- when I'm giving you an honest answer.</p> <p>16 Q No, you're not. You're not answering --</p> <p>17 A I'm giving you the same answer I gave</p> <p>18 Kiha.</p> <p>19 Q But it's --</p> <p>20 A It's the truth.</p> <p>21 Q It's not.</p> <p>22 A It's consistent, and it's the truth.</p> <p>23 Q Ms. Stevenson --</p> <p>24 A I was not there in California.</p> <p>25 Q Was Mr. Boyette performing, yes or no?</p>
<p style="text-align: right;">Page 190</p> <p>1 A Oh, that's fine.</p> <p>2 Q You have an obligation to answer the</p> <p>3 questions.</p> <p>4 A I'm answering you.</p> <p>5 Q Listen --</p> <p>6 A But that's the answer I gave Kiha. It</p> <p>7 doesn't change. It's the truth.</p> <p>8 Q You haven't answered my question.</p> <p>9 A I did.</p> <p>10 Q Did Mr. Boyette --</p> <p>11 A I'm answering you.</p> <p>12 Q Listen to my question.</p> <p>13 A I told her when I booked the trip, it is</p> <p>14 for pleasure. That is all I said to Kiha.</p> <p>15 Q Yeah. Ms. Stevenson --</p> <p>16 A I'm not booking --</p> <p>17 Q -- we can do this all day.</p> <p>18 A -- nothing for business.</p> <p>19 Q Was Mr. Boyette performing in that concert</p> <p>20 or not?</p> <p>21 A Like I said to -- I was not there. And I</p> <p>22 said all this to --</p> <p>23 Q So you don't know.</p> <p>24 A I know when I -- when I booked the trip it</p> <p>25 is for pleasure.</p>	<p style="text-align: right;">Page 192</p> <p>1 A I was not there.</p> <p>2 Q You don't know.</p> <p>3 A I was not there.</p> <p>4 Q Was Mr. Boyette --</p> <p>5 A I was in Atlanta.</p> <p>6 Q Was Mr. Boyette paid?</p> <p>7 A I was not there. I don't -- I don't know</p> <p>8 that.</p> <p>9 Q You would agree with --</p> <p>10 A That's not a fair question --</p> <p>11 Q But you would --</p> <p>12 A -- because I don't know that.</p> <p>13 Q You would agree --</p> <p>14 A Kiha didn't even ask me that.</p> <p>15 Q You would agree with me, Ms. Stevenson,</p> <p>16 that if Mr. -- listen to me.</p> <p>17 A Uh-huh.</p> <p>18 Q If Mr. Dais and Mr. Boyette were traveling</p> <p>19 to a show so that Mr. Boyette could get paid --</p> <p>20 A Oh, no.</p> <p>21 Q -- then it would be --</p> <p>22 A No.</p> <p>23 Q -- business; correct?</p> <p>24 A No. They don't get paid. They don't get</p> <p>25 paid.</p>

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1 Q How do you know? You just said you didn't
2 know.
3 A No. You're trying to put words in my
4 mouth, Ben. That is not the way of it. No, no, no,
5 no, no, no.
6 Do you know how many shows I've done free?
7 All of them.
8 Q Yeah. Ms. Stevenson, you just
9 testified --
10 A No, all of them.
11 Q -- you didn't know.
12 A I don't know. I said I wasn't there. But
13 I know that they don't get paid. They're not --
14 they don't get paid for that.
15 Q How do you know?
16 A I wasn't there. That was my -- that's
17 my -- that was my boyfriend. If anybody knows the
18 financial situational state, believe me, I do.
19 Q How do you know that Mr. Boyette --
20 A Believe me, I know.
21 Q -- did not get paid?
22 A If anybody knows the struggle, I do.
23 That's the fact. That's the truth.
24 Q How do you know that Mr. Boyette didn't
25 get paid for this show?

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1 A I was not there.
2 Q So you don't know.
3 A I was -- I was -- you're asking -- I said
4 I wasn't there.
5 Q So you don't know.
6 A I wasn't there.
7 Q Do you know?
8 A I was not there. No, I do not know. I
9 wasn't there. Exactly.
10 Q All right.
11 A But I -- we're not talking about that.
12 We're talking about travel. This is why I lost --
13 well, I don't know. We'll get to that in a minute.
14 But I wasn't there.
15 Q Okay. Mr. Boyette and Mr. Dais traveled
16 together frequently when Mr. Dais was using your
17 travel passes; correct?
18 A Say what?
19 Q Mr. Boyette and Mr. Dais traveled together
20 on repeated vacations.
21 A Uh-huh. I guess -- I guess they have --
22 Q Yes.
23 A -- when they traveled together.
24 Q When Mr. Dais was using your travel
25 passes; correct?

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1 A Yes.
2 Q And when Mr. Dais and Mr. Boyette was
3 traveling together, Mr. Boyette, because he was
4 having to use buddy passes, was -- had to pay some
5 taxes and fees; correct?
6 A Yeah, yeah.
7 Q And Mr. Dais paid all those taxes and fees
8 for Mr. Boyette; correct?
9 A I -- I mean you're asking me a question --
10 no. I mean I don't -- to my understanding, I think
11 his mom manages him or whatever too. So I -- again,
12 I don't know. I can't answer that question. I
13 don't know. I'll be honest now, I do not know who
14 pays for -- for this kid's stuff. Now that I don't
15 know.
16 Q All right.
17 A Because he is not -- yeah. He don't --
18 that's not his kid. They do shows, but that's not
19 his kid.
20 (Exhibit 16 was marked for
21 identification.)
22 BY MR. STONE:
23 Q Let me show you what I'm going to mark as
24 Exhibit 16.
25 A I saw that. I think they sent that to me

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1 in the mail.
2 Q So you've seen that before?
3 A Yeah. They sent that to me.
4 Q And you recognize that as something that
5 Delta had that reflected social media
6 communications --
7 A Right, she told me about that.
8 Q -- both by Mr. Dais and --
9 You've got to let me finish my question,
10 Ms. Stevenson.
11 A I'm sorry. Go ahead.
12 Q You recognize that, Exhibit No. 16, as a
13 document that Delta had that reflected social media
14 communications by Mr. Dais and Mr. Boyette about the
15 reason for the trip on June 15th; correct?
16 A Uh-huh.
17 Q Yes?
18 A Yeah. I saw this. Yeah, they sent this
19 to me.
20 Q Okay. And because you were not in
21 California, you don't know what time, for example,
22 Mr. Boyette went on to the show --
23 A Yeah. Like I said, I don't know --
24 Q -- or what time --
25 A -- what time their stuff is. I don't. I

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<p style="text-align: right;">Page 197</p> <p>1 was at work, I'm sure.</p> <p>2 Q Okay. Where else did Mr. Dais and</p> <p>3 Mr. Boyette travel together?</p> <p>4 A Again, like I -- as I stated to Kiha, I</p> <p>5 can't say that I remember every single place,</p> <p>6 especially now even at this point. Even at that</p> <p>7 time, which was now about two years ago, it's -- I</p> <p>8 wrote out as much I could, as fast as I could</p> <p>9 because I was on the spot, like write it all out, so</p> <p>10 I -- it's here. I mean Phoenix. I don't even think</p> <p>11 Phoenix is on here.</p> <p>12 But, again, I wasn't given that -- I</p> <p>13 wasn't -- I was only given a set time to write this,</p> <p>14 which was less than five minutes or so. And I wrote</p> <p>15 out what I could write out as fast as I could. So,</p> <p>16 clearly, I do not have everything, you know, as far</p> <p>17 as -- yeah.</p> <p>18 Q Okay.</p> <p>19 A But I'll reiterate, it's always for</p> <p>20 pleasure, which is what I said to Kiha.</p> <p>21 Q Yeah. I know you say that, Ms.</p> <p>22 Stevenson --</p> <p>23 A It is true.</p> <p>24 Q -- but you don't know.</p> <p>25 A I wouldn't live a life like that. I</p>	<p style="text-align: right;">Page 199</p> <p>1 Cole the whole -- for the most part of that -- for</p> <p>2 that most part of that tour all over the place,</p> <p>3 America, he -- I don't even -- I think he might have</p> <p>4 flown maybe one time. The entire tour, they were on</p> <p>5 a bus.</p> <p>6 And so she was like, she said, Okay.</p> <p>7 So I said, So on that tour, he didn't --</p> <p>8 he didn't fly. You know, like he didn't use my</p> <p>9 benefits, even though it was for pleasure. That</p> <p>10 whole time he was on a bus. I mean but here's the</p> <p>11 thing. They were on a bus. They didn't use -- and</p> <p>12 if he had to call me for something, I -- of course,</p> <p>13 I would book it, like if he got stuck somewhere.</p> <p>14 But, again, a pleasure trip. If they got</p> <p>15 a break. Hey, we're going to go down to Miami for</p> <p>16 two days. Keesha is giving us a break, that's how</p> <p>17 the particular conversation would go. Keesha is</p> <p>18 giving us a break for two days. Hey, I'm going to</p> <p>19 come back to the Atlanta, blah, blah, blah. That's</p> <p>20 how that went. He was on a bus for that tour.</p> <p>21 Q So let me make sure --</p> <p>22 A So he wasn't flying on Keesha Cole to</p> <p>23 different places. They were on a bus.</p> <p>24 Q So what's the name of this artist you're</p> <p>25 talking about, Keesha Cole?</p>
<p style="text-align: right;">Page 198</p> <p>1 wouldn't.</p> <p>2 Q Yeah. Why was Mr. Boyette traveling to</p> <p>3 Houston for pleasure?</p> <p>4 A I'm sorry, say that again.</p> <p>5 Q Why was Mr. -- I'm sorry -- strike that.</p> <p>6 Why was Mr. Dais traveling to Houston for</p> <p>7 pleasure?</p> <p>8 A They do travel for pleasure to Houston. I</p> <p>9 think I remember Kiha asking me that. That's one of</p> <p>10 the hangout spots when -- him and his boys hang out</p> <p>11 there. Miami, I stated that to her, they go</p> <p>12 clubbing. That's one of the places that they really</p> <p>13 like to party.</p> <p>14 Q Okay. What about St. Louis?</p> <p>15 A Same thing.</p> <p>16 Q Okay. So every place he went, he would go</p> <p>17 party?</p> <p>18 A I think I did St. Louis --</p> <p>19 Yes, they do. And as I -- I made real</p> <p>20 clear to her, like even when he did a tour, because</p> <p>21 the Mehret lady, she vouched for what I said when I</p> <p>22 said, Well, if you see something -- since you say --</p> <p>23 you say you follow my boyfriend.</p> <p>24 Yes, I do follow your boyfriend.</p> <p>25 Okay. I said, He was on tour with Keesha</p>	<p style="text-align: right;">Page 200</p> <p>1 A Yeah, Keesha Cole.</p> <p>2 Q What kind of artist is she?</p> <p>3 A She's an R&B artist. I like her. She</p> <p>4 makes good music.</p> <p>5 Q Does he represent her?</p> <p>6 A No. He doesn't -- he doesn't --</p> <p>7 Q Why is he touring --</p> <p>8 A Well, that was, again, some years ago.</p> <p>9 But just --</p> <p>10 Q Helping her out?</p> <p>11 A Yeah, he knows -- it's all -- he knows the</p> <p>12 people that tour her. And so they just let him --</p> <p>13 I'll put it to you like they let him hop on the bus.</p> <p>14 And he just ended up going state to state. People</p> <p>15 try to get their foot in the door. I guess</p> <p>16 he's trying to --</p> <p>17 Q Yeah, I'm with you. So he's riding -- so</p> <p>18 he's trying to build his career.</p> <p>19 A Yeah, because clearly he didn't -- he</p> <p>20 didn't get paid for that, and he was on a bus.</p> <p>21 Q Okay. So he's -- and then if he gets --</p> <p>22 if he's traveling with her, and he gets stuck</p> <p>23 somewhere and he wants to get home, he'll call you,</p> <p>24 and you'll get him home.</p> <p>25 A Well, I wouldn't -- let me -- I</p>

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<p style="text-align: right;">Page 201</p> <p>1 wouldn't -- I wouldn't want you to put the words in 2 my mouth like that again. If she lets them off for 3 like two or three days, him and his buddies, they 4 love Houston, they love Miami. Hey, I want to fly 5 down -- I want to go meet Dunn down in Miami. Okay, 6 cool, something like that, but not for business. 7 Q And then they would fly back and meet the 8 tour up again? 9 A Sometimes if she -- if her bus was coming 10 through there, he would just -- you know, just get 11 back on the bus. 12 Q Or otherwise he would fly back and get 13 her? 14 A Not -- again, not for business, Ben, not 15 for business. 16 Q Well, I'm trying to understand what you're 17 telling me. 18 He's on tour with this woman; correct? 19 A Yeah. When he's on -- 20 Q And he's flying there and flying back. 21 A Right. What I was making clear to Kiha is 22 if you want to try to make it like -- at the time I 23 was telling her you want to try to make it like 24 business. It's not business. 25 Because when he does that kind of</p>	<p style="text-align: right;">Page 203</p> <p>1 (Exhibit 17 was marked for 2 identification.) 3 BY MR. STONE: 4 Q Let me show you Exhibit No. 17. 5 A Because that's what I was telling Kiha. I 6 was like I know you all -- you all can see 7 everything. 8 THE WITNESS: Sheandra, you all got the 9 record, you know, so you all can see where we 10 can fly. 11 So that's what I'm saying. It's a 12 record -- you can see everywhere we fly. 13 That's why I was like -- 14 BY MR. STONE: 15 Q I haven't counted them. It's certainly 16 well over 100 trips here. 17 A Yeah, because he's been my -- I mean I've 18 been with Delta almost ten years, yeah. 19 Q Well, I'm just talking -- 20 A Oh, okay. 21 Q I'm just talking in 18 months. 22 A Oh, okay. Yeah. 23 Q And can you tell me on any one of -- for 24 instance, I'll pick one at random. If I look at a 25 flight in -- in June of 2014, for example, I see</p>
<p style="text-align: right;">Page 202</p> <p>1 business, if he's on a bus -- anybody that knows 2 anything about the entertainment business, most of 3 the time most artists are on buses. They're not in 4 the air. They got to hit those cities. They're 5 hitting -- he's on a bus. 6 So he's not -- he's not flying for 7 business. He's just not. They're on a bus. That's 8 what -- they make their money with buses. But he's 9 not the one making the money. That's what I want to 10 make clear to you. Clearly, Keesha wasn't even 11 making all of the money. 12 So, yeah, he's not -- he's just trying -- 13 was trying to build himself up, and he happened to 14 know somebody that rolls with her, and they let him 15 get on because he knows a little bit about music. 16 No. The money would have been nice. But, 17 huh-uh, he didn't get paid for that. 18 Q If I were to show you Mr. Dais's travel, 19 and it's -- as you know, it's extensive. 20 A Yeah. I think I -- 21 Q Would you be able to tell me on any given 22 trip what it is he's doing? 23 A Oh, I never -- can I see it, or is that 24 something I can't see? 25 Q I'll show it to you.</p>	<p style="text-align: right;">Page 204</p> <p>1 flights to Richmond. 2 Do you have any idea what he's doing in 3 Richmond? 4 A Huh-uh. 5 Q No? 6 A Virginia. 7 Q Yeah. 8 A Pleasure. 9 Q What is it? What's he doing; do you know? 10 A Again, I have to go back to what I said, I 11 mean I'm not with him on there. So, yeah, I can't 12 say, you know -- 13 Q So you think it's for pleasure, but you 14 don't know what he's doing; correct? 15 A I will say I know it's for pleasure but -- 16 Q But you don't know what he's doing. 17 A But I don't -- yeah, I'm not there with 18 him. And I did state that to Kiha. I don't know. 19 I know -- well, he could have been up there with his 20 father. His father is up in that area, you know. 21 Q Are you aware of anybody else, other than 22 you, where Delta concluded -- 23 A I just know -- 24 Q You've got to let me finish my question, 25 Ms. Stevenson.</p>

<p style="text-align: right;">Page 205</p> <p>1 A Oh, okay. No. I wasn't trying to cut you</p> <p>2 off. I was venting, I'm sorry.</p> <p>3 Q Do you know of anybody else, other than</p> <p>4 you, Ms. Stevenson, who Delta found to have misused</p> <p>5 their travel passes for business purposes?</p> <p>6 A You said do I know anybody else?</p> <p>7 Q Do you know anybody else where Delta has</p> <p>8 made that determination?</p> <p>9 A I mean I can't necessarily say like I know</p> <p>10 I know. I mean people talk. Just to answer you</p> <p>11 honestly, you know, people talk in conversations.</p> <p>12 You overhear stuff from people that you know, you</p> <p>13 work with, used to work with, say, Oh, this</p> <p>14 person -- something about their companion. I don't</p> <p>15 get off in the, you know, conversation and say, Oh,</p> <p>16 well, who is this or who is that? You know, you</p> <p>17 just hear people talking. I wouldn't say -- no, not</p> <p>18 directly. I can't say, you know.</p> <p>19 Q Can you indirectly -- can you give me a</p> <p>20 name of anybody else that Delta --</p> <p>21 A No. I'm saying like I -- yeah, I --</p> <p>22 Q So --</p> <p>23 A I don't know.</p> <p>24 Q -- if there is any such person --</p> <p>25 A I hear talks of it. But, like I said, I</p>	<p style="text-align: right;">Page 207</p> <p>1 still working, and I don't have my job.</p> <p>2 Q Anybody get written up for what you did,</p> <p>3 using travel passes for business purposes?</p> <p>4 A Well, I didn't use my travel pass for</p> <p>5 business purposes.</p> <p>6 Q Did anybody get written up for misuse of</p> <p>7 travel passes for business purposes that you know?</p> <p>8 A I didn't -- like I said, I -- not that</p> <p>9 I -- not that I can say I know right now.</p> <p>10 Q Okay. Do you -- we talked a little bit</p> <p>11 ago about your shoulder injury, that you hurt</p> <p>12 your -- or your shoulder and cervical injury from</p> <p>13 the bag fall; correct?</p> <p>14 A Yeah, my -- it's my neck and my shoulder</p> <p>15 and my back, but it's all -- yeah.</p> <p>16 Q And you were on -- you were on leave as a</p> <p>17 result of that, it looks to me, from roughly March</p> <p>18 of 2014 to roughly November 2014?</p> <p>19 A November 10. I think I remember the exact</p> <p>20 time, because it was the day after my birthday, I</p> <p>21 think.</p> <p>22 Q All right.</p> <p>23 (Discussion off the record.)</p> <p>24 (Brief break.)</p> <p>25</p>
<p style="text-align: right;">Page 206</p> <p>1 here talks, Oh, this person got wrote up or -- I</p> <p>2 know one coworker had told me one time, I was still</p> <p>3 working there though, They saw frequent travelers,</p> <p>4 saw my companion. Because he came out of the office</p> <p>5 upset. He's like, Well, they just wrote me up.</p> <p>6 He still works there to this day. But</p> <p>7 they just wrote me up or whatever. Told me you need</p> <p>8 to tell your companion -- how did he say -- you need</p> <p>9 to tell your companion to calm down all the flying</p> <p>10 or whatever. That was it. I didn't ask him nothing</p> <p>11 else. I just left it at that, whatever.</p> <p>12 Q Who are we talking about? What's the name</p> <p>13 of this person?</p> <p>14 A He got wrote up or something for the</p> <p>15 person.</p> <p>16 Huh?</p> <p>17 Q What's the name of this person?</p> <p>18 A I don't -- I'll be honest, this was some</p> <p>19 years ago, and I just do remember something like</p> <p>20 that happened. But I do not know anybody directly</p> <p>21 like you said. I don't.</p> <p>22 Q Okay.</p> <p>23 A I don't.</p> <p>24 Q All right.</p> <p>25 A People get wrote up all the time, and they</p>	<p style="text-align: right;">Page 208</p> <p>1 BY MR. STONE:</p> <p>2 Q Ms. Stevenson, we're back on the record</p> <p>3 here.</p> <p>4 A Yes, sir.</p> <p>5 Q Let me backtrack for just ten seconds</p> <p>6 here.</p> <p>7 We were, a moment ago, talking about the</p> <p>8 interview that you had about the travel pass --</p> <p>9 A Uh-huh.</p> <p>10 Q -- events. And we looked at -- we talked</p> <p>11 about that interview, and we looked at your written</p> <p>12 statements.</p> <p>13 A Uh-huh.</p> <p>14 Q Was there anything else that happened,</p> <p>15 first of all, in the interview that we have not</p> <p>16 talked about? Is there anything they said to you or</p> <p>17 you said to them that you have not told me about</p> <p>18 today?</p> <p>19 A With Kiha, right, that one?</p> <p>20 Q (No response, indicating.)</p> <p>21 A Oh, gosh, let me think. I want to be</p> <p>22 accurate. That's been so long. I think we covered</p> <p>23 most of everything.</p> <p>24 I just wanted to be clear on -- that I</p> <p>25 made sure that I was real clear about he wasn't with</p>

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<p style="text-align: right;">Page 209</p> <p>1 me, you know, at my aunt's funeral. I was real</p> <p>2 clear about we had not traveled together. I made</p> <p>3 that clear to Kiha. And, yeah, that -- yeah,</p> <p>4 that -- yeah, she -- yeah, she didn't -- because,</p> <p>5 like I said, most of the focus of that particular</p> <p>6 was -- it wasn't even focused on like -- but it</p> <p>7 was -- it was more really, really focused on the</p> <p>8 companion thing. That's what most of that was</p> <p>9 about.</p> <p>10 Q And you've told me everything that you can</p> <p>11 recall happening and being said in that meeting?</p> <p>12 A I can't say I've said everything, Ben, but</p> <p>13 mostly I think I have covered -- it always</p> <p>14 happens -- maybe I might think of something a little</p> <p>15 later. But right this second, I can't think of</p> <p>16 anything else that I honestly can think of and say,</p> <p>17 okay, Kiha said this or Mehret said this or</p> <p>18 whatever. I can't think of nothing else. Because</p> <p>19 you kind of were very thorough on most of it, which</p> <p>20 was about --</p> <p>21 And then, like I said, it ended up with,</p> <p>22 you know, she came back in there and was like the --</p> <p>23 she was going to suspend my flight privileges until</p> <p>24 further notice. And then -- I can't think -- no. I</p> <p>25 don't think --</p>	<p style="text-align: right;">Page 211</p> <p>1 Q -- the baggage --</p> <p>2 Something else that happened in that</p> <p>3 meeting?</p> <p>4 A Yeah. Well, my PL, I kind of looked over</p> <p>5 at him. He looked at me. And I mean I don't -- I</p> <p>6 just -- I was like this -- I don't know. He kind of</p> <p>7 agreed with me on a lot of stuff. He just didn't</p> <p>8 think some stuff was done quite right but --</p> <p>9 Q What did he say to you?</p> <p>10 A Well, he just said he kind of just didn't</p> <p>11 agree with some of the way that that kind of</p> <p>12 occurred and went down. And, you know, he told</p> <p>13 me -- he was like, You answered the questions -- he</p> <p>14 was like, You did a really good job. You answered</p> <p>15 the questions honestly. I just don't agree with the</p> <p>16 way that that kind of occurred for you.</p> <p>17 Q When did he say that to you?</p> <p>18 A He said that to me -- her and Mehret was</p> <p>19 kind of finishing up some stuff. He -- I kind of</p> <p>20 looked over, and I was like, What -- I'm a good</p> <p>21 employee.</p> <p>22 And he was just like, I don't really -- in</p> <p>23 his little raspy voice, I don't really agree with</p> <p>24 that. And we walked out. And we were walking back,</p> <p>25 and he was like, You just go on and go back. He was</p>
<p style="text-align: right;">Page 210</p> <p>1 Q That's as much --</p> <p>2 A Yeah, because she said -- yeah, because</p> <p>3 she was like she didn't feel like I couldn't</p> <p>4 remember every -- everywhere that my companion had</p> <p>5 flown to. And I was clear on -- again, it had been</p> <p>6 so long, and I booked so many trips for him, there</p> <p>7 was no way that I -- that I could just remember all</p> <p>8 of that like in that short period of time. And this</p> <p>9 was something that I wasn't even aware of. That I</p> <p>10 was even, what do you call it, being interviewed or</p> <p>11 investigated for because I didn't know that there</p> <p>12 was a problem. I made that clear to her.</p> <p>13 Q Okay. Anything else that you can recall</p> <p>14 that was said in that meeting that you recall?</p> <p>15 A No, nothing else. And, like I said,</p> <p>16 because I was never -- I was never counseled or</p> <p>17 anything on anything about the companion before her,</p> <p>18 or nothing was ever -- like no -- nothing. I was</p> <p>19 never coached, nothing.</p> <p>20 Q Listen to my question.</p> <p>21 Was there anything else that was said in</p> <p>22 that meeting that you haven't told me about?</p> <p>23 A Nothing that I can think of at this time.</p> <p>24 Q All right. We talked earlier about the --</p> <p>25 A Can I say one last thing?</p>	<p style="text-align: right;">Page 212</p> <p>1 like, But don't worry about that. You answered</p> <p>2 honestly. You were concise. I know you didn't know</p> <p>3 what was that all --</p> <p>4 I was like, I don't. I was honest.</p> <p>5 And he was like, you know, But never</p> <p>6 have -- in all the time I've been here ever seen</p> <p>7 anything -- I don't agree with the way that that</p> <p>8 happened for you.</p> <p>9 And that was it. And I worked the rest of</p> <p>10 my shift that day. And then when I got off that</p> <p>11 evening --</p> <p>12 Q All right.</p> <p>13 A -- my supervisor --</p> <p>14 Q I didn't ask --</p> <p>15 A Oh.</p> <p>16 Q I didn't ask you anything about that.</p> <p>17 A He talked to me again.</p> <p>18 Q Anything --</p> <p>19 A That was it. That was it. I'm just -- as</p> <p>20 I'm talking, I'm trying to think of, as I was</p> <p>21 talking to you, if that was it. That was it. And</p> <p>22 then --</p> <p>23 Q Did Mr. -- did your performance leader say</p> <p>24 something to you later about the meeting, other than</p> <p>25 what you've told me already?</p>

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<p style="text-align: right;">Page 213</p> <p>1 A When I -- at the end of my shift that</p> <p>2 night, yeah -- well, he -- yeah, he just -- again,</p> <p>3 he just -- he didn't -- he knows I'm a good</p> <p>4 employee. And he's just like, you know, Just stay</p> <p>5 on your Ps and Qs. You're a good employee. I don't</p> <p>6 like the way that occurred, but you'll be fine.</p> <p>7 And, you know, just --</p> <p>8 Q Anything else?</p> <p>9 A You'll be fine. I got your back. Because</p> <p>10 he was in -- and that was it. And he said, Have a</p> <p>11 good night. And I walked out of my thing, and I got</p> <p>12 on my employee bus and --</p> <p>13 Q Okay. We were talking earlier about</p> <p>14 your -- when the bag fell on you; correct? You had</p> <p>15 an OJI?</p> <p>16 A Yes, sir.</p> <p>17 (Exhibit 18 was marked for</p> <p>18 identification.)</p> <p>19 BY MR. STONE:</p> <p>20 Q And I've put in front of you what I've</p> <p>21 marked at Exhibit 18. Let me start here.</p> <p>22 Does this, first of all, refresh your</p> <p>23 recollection that the injury that you suffered</p> <p>24 occurred in 2014? (Indicating.)</p> <p>25 A Uh-huh.</p>	<p style="text-align: right;">Page 215</p> <p>1 Released as of August of 2014. You were released to</p> <p>2 work on regular duty; correct?</p> <p>3 A You know what, no -- well, I guess, I -- I</p> <p>4 don't know if that's accurate because I didn't go</p> <p>5 back to work until November.</p> <p>6 Q Okay. Fair enough.</p> <p>7 But you -- you see here that as of -- and</p> <p>8 I realize it --</p> <p>9 A That might have been if --</p> <p>10 Q -- may have taken you some time. But you</p> <p>11 were released to full duty as of August of 2014, is</p> <p>12 that correct, according to these notes?</p> <p>13 A Yeah. I guess that's what it said. But</p> <p>14 that must be an error because -- yeah. I would have</p> <p>15 went back to work then. I don't think I even went</p> <p>16 back to work then. I don't think I went back until</p> <p>17 November. This might be -- I'm pretty sure this is</p> <p>18 an error because I wouldn't have had no job after</p> <p>19 this. I'm saying like if I -- if I didn't comply</p> <p>20 with that I was supposed to do. So I think this is</p> <p>21 an error because maybe -- I don't know. I should</p> <p>22 have one for the November.</p> <p>23 (Exhibit 19 was marked for</p> <p>24 identification.)</p> <p>25</p>
<p style="text-align: right;">Page 214</p> <p>1 Q Yes?</p> <p>2 A Oh, you said does this what?</p> <p>3 Q Refresh your recollection that your injury</p> <p>4 occurred in 2014?</p> <p>5 A Yes, yes.</p> <p>6 Q And you were out from March of 2014 until</p> <p>7 November 10th of 2014; correct?</p> <p>8 A Uh-huh, uh-huh.</p> <p>9 Q Yes?</p> <p>10 A Yes, sir.</p> <p>11 Q And you weren't out of work for your</p> <p>12 injury after that; correct?</p> <p>13 A After -- you mean when I went back in</p> <p>14 November?</p> <p>15 Q Correct.</p> <p>16 A No. I was just getting ready to go --</p> <p>17 Dr. Kelley wanted to keep me on what you call</p> <p>18 ongoing kind of therapy or whatever. So even though</p> <p>19 I went back, he still wanted to try to keep me like</p> <p>20 in therapy or whatever.</p> <p>21 Q But you were -- if you look at Exhibit</p> <p>22 No. 18 --</p> <p>23 A I'm trying to make sure I understand.</p> <p>24 Q -- for a minute, you were released</p> <p>25 actually a little earlier. And then you came back.</p>	<p style="text-align: right;">Page 216</p> <p>1 BY MR. STONE:</p> <p>2 Q All right. I have one that's right before</p> <p>3 then in October of 2014.</p> <p>4 A That might be when they was getting me</p> <p>5 ready to go back in November.</p> <p>6 Q And you were released to full-duty work as</p> <p>7 of -- according to the Exhibit 19, as of October 17,</p> <p>8 2014?</p> <p>9 A Yeah. So this might be the one -- yeah,</p> <p>10 this -- yeah. I don't think this one is the right</p> <p>11 one. I think this one is more accurate.</p> <p>12 Q All right.</p> <p>13 A Yeah. He kept me in therapy.</p> <p>14 Q He kept you in therapy, but he didn't</p> <p>15 restrict your work; right?</p> <p>16 A Right, at that point, until the</p> <p>17 following -- the following year when I started kind</p> <p>18 of having issues again.</p> <p>19 Q Well, tell me about that because I'm not</p> <p>20 aware of that.</p> <p>21 A When was that -- oh, I thought I had</p> <p>22 said -- that was -- I was trying to -- what it was</p> <p>23 is I was trying to get another appointment to see</p> <p>24 him, like I think sometime in April or whatever.</p> <p>25 And I was having trouble getting in then.</p>

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1 I think they put me back on -- was it -- I
2 think -- did he put me back -- he put me back on
3 light duty, because then they wanted to see if they
4 needed to do some kind of procedure or something.
5 And I think that was around -- that was probably in
6 July. I think it was July. Because I tried to -- I
7 tried to get back with them in April and May.
8 They had me in the system. But then the
9 assistant person called me and was like, Sorry,
10 Ms. Stevenson, I know we've been trying to get you
11 in. They didn't get me in until July. He assessed
12 me again. Then he wanted to do something else. I'm
13 sorry, I've been seeing him for so many years. It's
14 a lot of paperwork. I don't remember all of it.
15 Q I am aware that you saw -- you went to
16 Peachtree Orthopaedics in May of 2015?
17 A Uh-huh.
18 Q And this may be what you're remembering.
19 A Oh, maybe that's what I --
20 (Exhibit 20 was marked for
21 identification.)
22 BY MR. STONE:
23 Q And you saw him -- and you're right, he
24 did some additional treatment, but he also, you'll
25 see from Exhibit 20 --

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1 A Uh-huh.
2 Q -- released you to full duty work in May
3 of 2015.
4 Is that consistent with your recollection?
5 A Yeah, he sent me -- he sent me back.
6 Q Okay.
7 A But then he took me back out again. Yeah,
8 he's -- that's right. I need to -- he took me back
9 out again in July, yeah, in July, yeah, in July.
10 Q Were you on -- when you say he took you
11 out, you took leave from work during that period of
12 time?
13 A No, I didn't take a leave. I just -- like
14 I said, I went to see him again, and I was in --
15 from what he assessed, I was in so much pain, he put
16 me back on light duty again. I was still working.
17 Put me on light duty.
18 But then like right after that I think
19 that's when everything -- all the -- the interview
20 and craziness started happening, and he put me on
21 light duty. I was on light duty or something.
22 Q You were put on light duty at Delta?
23 A Uh-huh.
24 Q So you started working the light duty
25 temporary assignment?

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1 A No, because they didn't -- they didn't
2 offer that or whatever so --
3 Q So what --
4 A And I didn't have a job at that point
5 anymore.
6 Q So you took a -- I'm confused.
7 So this was after your termination from
8 Delta that he put you on light duty?
9 A No, my -- here's the thing. I think I saw
10 him. My appointment was -- I think it was -- no,
11 that was the thing. My appointment was scheduled
12 before that with the May thing that you're looking
13 at. But then I ended up being on light duty.
14 I was suspended. I was suspended. I
15 wasn't told I was terminated or anything like that.
16 I was just -- I was told, You'll get a call back
17 within like a week to let -- and by seven days to
18 let you know when you can return back to work.
19 And the person that kind of relayed it to
20 me, I was like, Okay, am I being suspended with pay
21 or without.
22 I don't know.
23 And then the last thing they said to me
24 verbatim was, I'll never forget that, he said, I'm
25 just here to relay a message. I don't know what's

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1 going on.
2 I said, This is my job. Like am I
3 being --
4 No, they -- they didn't tell me if I was
5 being paid. I didn't sign off on it. It was
6 nothing. It was just suspended. They didn't know.
7 They just said they didn't know anything. They just
8 relayed the message to me.
9 And I was walked out for suspension. I
10 would hear from them in seven days, but I didn't
11 hear anything for almost a month.
12 Q Before you were terminated?
13 A Yeah.
14 Q What I'm trying to figure out is from
15 Exhibit No. 20 we know that you were released to
16 full duty in May of 2015.
17 A Right.
18 Q And based on what I'm looking at, you were
19 able to work full duty from the time you came back
20 all the way at least until after May.
21 A Yeah.
22 Q Was there some point that changed?
23 A Yeah. Well, that's the thing, I -- around
24 this time is when I was doing my accommodation --
25 when I got my accommodations -- well, I actually

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1 asked for accommodations even before this right
2 here.
3 Q We looked at that earlier; correct?
4 A Right, yeah, that's what we looked at that
5 earlier.
6 So, again, like I say, on the job, I was
7 going through all the stuff I was going through with
8 my PL, which was Carole at the time, with certain
9 stuff, oh, I couldn't stand this long, or I couldn't
10 do whatever. And that became more and more hostile
11 too with all kinds of stuff.
12 So, again, I had made an appointment to
13 try to go back to the doctor. They couldn't -- they
14 didn't get me in when I needed to. So I didn't end
15 up getting back to the doctor until July. And then
16 he put me on -- put me on light duty.
17 And then I was I -- I was suspended before
18 that, I'm sorry, I was suspended. And then I was
19 terminated, like I said, almost a month later, like
20 three weeks later --
21 Q Let me go back --
22 A -- while I was on light duty.
23 Q -- to make sure.
24 So we know that you were released to full
25 duty as of May.

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1 A Right.
2 Q You had mentioned earlier, and we had
3 looked at your accommodation request. That was
4 related to something. That was related to your car
5 and your aunt and that stuff.
6 A Well, that -- but all of that was -- all
7 of that was related -- all of that was kind of in
8 there. With everything that I was dealing with, it
9 was all of that. It was the death. It was
10 everything that I was dealing with. I still -- the
11 injury was still there.
12 Because according to a couple of -- him
13 and a couple of doctors at the time it was like
14 that's not -- you're old -- you may look old, but
15 your body really is what it is. And as you get
16 older, it might get worse.
17 Q Listen to my question real quick here.
18 We talked about your accommodation
19 request --
20 A Uh-huh.
21 Q -- which was the shift change.
22 A Uh-huh.
23 Q And you were granted that; correct?
24 A Uh-huh, uh-huh.
25 Q You have to say yes.

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1 A Yes.
2 Q We talked about the bid that you made?
3 A Uh-huh.
4 Q Okay.
5 A Yes.
6 Q Was there any other accommodation that you
7 made through the accommodation process that you can
8 recall?
9 A No, it didn't, because all of it, to my
10 knowledge, I thought would have just fallen under
11 that. But the thing was while I was there if there
12 was somewhere -- they need me to purge a line, or I
13 have to stand here or stand there, and it's like,
14 Hey, I can't stand for too long, whatever, which
15 I -- but, to be honest, I really didn't even
16 complain about it. That kind of -- was going on.
17 Q Got it.
18 Okay. And you said --
19 A Because they was like you have to go to --
20 if you're still having issues, then you just need to
21 go to the doctor about that or whatever. Otherwise
22 you're going to have to whatever, because they
23 didn't -- that was kind of the thing.
24 Q And do you remember the date that you were
25 put on light duty? It was after -- it was after you

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1 were suspended?
2 A Yeah. But, remember, I had already seen
3 the doctor. I don't remember the actual date, but
4 it was right around that time. To be honest with
5 you, it might have been -- yeah, it was -- yeah. I
6 can find that out for you.
7 Q Okay. And you said -- you told me already
8 about your suspension, right, the call in which you
9 were told they were --
10 A Well, she told me in -- when I was in the
11 meeting with Kiha she suspended the benefits. Then
12 two days later I came in to work for my coworker.
13 So when I -- when I got there to work for the
14 coworker, that is when I was -- when it went from my
15 benefits were suspended. I came in to work for
16 somebody. Then it was, Oh, now, you're suspended.
17 That's the order. It wasn't a call. I wasn't told
18 in person.
19 And then that's when I asked the person, I
20 said, Well, am I being paid? Can I -- when do I
21 come --
22 Well, you're going to get a call within
23 seven days, and we'll let you know if you can go
24 ahead and come back.
25 And I was like, Oh, okay. And I tried to

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<p style="text-align: right;">Page 225</p> <p>1 ask, I said, Anything else --</p> <p>2 And then he -- well, I don't know if I'm</p> <p>3 supposed to say all of that. He, you know, again,</p> <p>4 Go get her things. And, again, I didn't know -- it</p> <p>5 was a whirlwind. And, you know, he was just</p> <p>6 relaying a message.</p> <p>7 I said, From who?</p> <p>8 He didn't say from who. He said, I'm just</p> <p>9 relaying a message. I don't know what's going on.</p> <p>10 Other people came in. They took me out. And I was</p> <p>11 on the parking lot.</p> <p>12 And the one supervisor said -- he</p> <p>13 whispered in my ear, Give me a call. And went to my</p> <p>14 car. They took my thing off the car. And was like,</p> <p>15 You'll get a call in about seven days, but I didn't</p> <p>16 hear anything for -- it was like three weeks.</p> <p>17 Q And then how did you find out you were</p> <p>18 terminated?</p> <p>19 A I got a call on the 29th. And it was a</p> <p>20 message left. So then I called back. And when I</p> <p>21 finally called -- when I finally had called back,</p> <p>22 I -- my PL was telling me about everything, about</p> <p>23 the findings for the past -- of course, I don't</p> <p>24 remember verbatim how he worded it.</p> <p>25 But I remember most of -- you know,</p>	<p style="text-align: right;">Page 227</p> <p>1 until like five days later.</p> <p>2 And then I got a message that -- he had</p> <p>3 apologized to me about -- he apologized for not</p> <p>4 giving me that -- the information that he was</p> <p>5 supposed to have given me on the initial</p> <p>6 conversation or something so and that stuff.</p> <p>7 Q All right. And then did anything else</p> <p>8 happen, other than what you've just described in the</p> <p>9 termination call?</p> <p>10 A No, no, nothing that I can -- I think that</p> <p>11 was it. It was, I'm going to put you on no rehire</p> <p>12 and terminate you.</p> <p>13 Q I know that you appealed, and I'm going to</p> <p>14 ask you that in a moment.</p> <p>15 But before I do that, let me ask you</p> <p>16 whether or not -- we've now done a pretty thorough</p> <p>17 discussion of the events that occurred all leading</p> <p>18 up to your termination. And those are the</p> <p>19 complaints you're complaining -- the events that</p> <p>20 you're complaining about in this lawsuit.</p> <p>21 A Uh-huh.</p> <p>22 Q Is there anything that happened that</p> <p>23 during -- anytime in your employment, up until the</p> <p>24 time you were terminated, that you believe supports</p> <p>25 the claims that you're asserting in this lawsuit?</p>
<p style="text-align: right;">Page 226</p> <p>1 password, come back in and investigation. So we're</p> <p>2 going to go ahead and -- the findings are just have</p> <p>3 you resign. He was asking me if I wanted to resign.</p> <p>4 And I was clear, I said, No, I don't want</p> <p>5 to resign because I didn't do anything wrong.</p> <p>6 Okay. Well, in that case, I'm going to</p> <p>7 have to go ahead and -- so you're sure. I'm giving</p> <p>8 you the option.</p> <p>9 I said, If I resign it's like -- I did</p> <p>10 nothing wrong so I don't want to resign.</p> <p>11 He said, Okay, well, I'll tell you what,</p> <p>12 I'm going to have to -- I'm going to put you on the</p> <p>13 not rehire list, and I'm going to terminate you.</p> <p>14 I said, Okay.</p> <p>15 And then he hung up. And I wasn't like</p> <p>16 given no information or nothing. And then I just</p> <p>17 kind of had to call -- oh, he did state in that</p> <p>18 conversation that I was -- he had -- I was</p> <p>19 terminated the day before. But it was late in the</p> <p>20 day, it was late in the evening, I got busy, so I</p> <p>21 just figured I would just call you the next morning.</p> <p>22 Huh, okay, my career. So really it was</p> <p>23 the 28th. But he called me the next day, which was</p> <p>24 the 29th when I got the call from him. And then</p> <p>25 didn't give me all the information that I needed</p>	<p style="text-align: right;">Page 228</p> <p>1 Is there any fact that occurred, any statement or</p> <p>2 conversation that you had, anything else that you</p> <p>3 think supports your case that you haven't told me</p> <p>4 about?</p> <p>5 A I think a lot of -- a lot of -- how do I</p> <p>6 say it? Some of a lot of what I've said I think</p> <p>7 that it does.</p> <p>8 Do I -- do you want me to restate those?</p> <p>9 Q No. You've told me -- I'm not asking you</p> <p>10 to restate anything.</p> <p>11 A Oh, okay.</p> <p>12 Q I just want to know whether there's</p> <p>13 anything that you haven't told me about --</p> <p>14 A Oh.</p> <p>15 Q -- that you think supports your case that</p> <p>16 we haven't talked about today.</p> <p>17 A No. I -- yeah, I think some of a lot, but</p> <p>18 not everything, just some.</p> <p>19 Q Well, I realize not everything we've</p> <p>20 talked about is supportive of your case.</p> <p>21 A Right.</p> <p>22 Q But I just want to make sure that there's</p> <p>23 not something that you haven't told me about that</p> <p>24 you think supports.</p> <p>25 And there isn't?</p>

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1 A No.

2 Q So nobody -- nothing you said to anybody,

3 nothing that anybody said to you that you think

4 supports your case.

5 A No, sir.

6 (Exhibit 21 was marked for

7 identification.)

8 BY MR. STONE:

9 Q Take a look at Exhibit 21. And Exhibit 21

10 is a log of your appeal and, among other things, it

11 reflects an October 7, 2015, call --

12 A Yes.

13 Q -- that you would have had with EO,

14 particularly Barbara Shaw --

15 A Uh-huh.

16 Q -- about your termination and your appeal

17 of that.

18 A Uh-huh, uh-huh.

19 Q And I'm going to ask you to read the big,

20 long entry on Exhibit 21.

21 A Read this?

22 Q Yeah, on October 7th.

23 A Out loud?

24 Q No, not out loud, to yourself.

25 And I'm going to ask you whether or not

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1 that's an accurate summary of the conversation.

2 A Okay.

3 Q Take your time.

4 A (Witness complying.)

5 Okay. So the name is right, Mehret.

6 Q Yeah.

7 A Okay. I was just -- like I said --

8 (Discussion off the record.)

9 THE WITNESS: Okay.

10 BY MR. STONE:

11 Q All right.

12 A I don't know what this last one is.

13 Q Yeah, you're welcome to read that. I was

14 really going to focus on the one that's labeled

15 October 7, 2015.

16 A Yes, this -- oh, yeah, because -- oh, the

17 first one first. You don't want to address this

18 yet?

19 Q Well, I'm --

20 A Because that's not accurate at all.

21 Q Well, I'm going to -- let me ask you,

22 first of all, October 7, 2015, does that -- you

23 recognize that's a recount of a conversation.

24 A Uh-huh. That's --

25 Q Is it accurate?

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1 A -- pretty clear on everything that we've

2 discussed here but -- for the most part, yeah.

3 Q Is there anything in there that's

4 inaccurate that you can identify?

5 A Well, that part back there. But in this

6 part, the beginning to -- just this little section,

7 it is -- it's pretty clear. It's pretty clear.

8 Q Let me make sure what you're saying.

9 You're looking at an entry, it's a lengthy

10 entry --

11 A Yeah, this one to --

12 Q Stop. You've got to let me finish my

13 question.

14 You're looking at an entry labeled

15 October 7, 2015, that starts on page 1 of Exhibit 21

16 and continues on to page 2.

17 A Right. All of this I think pretty much is

18 accurate.

19 Q All the way --

20 A All the way down to that, yeah.

21 Q All the way to the end of the October 7,

22 2015; correct?

23 A Uh-huh.

24 Q Yes?

25 A Uh-huh.

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1 Q Yes?

2 A Yes, I'm sorry.

3 Q And there's nothing in there that you can

4 identify as inaccurate; correct?

5 A No. I think this is pretty much how the

6 conversation went, yes --

7 Q All right. And then --

8 A -- except she spelled the name wrong.

9 Q And on October 24, 2015, you say that that

10 entry is inaccurate.

11 A That is.

12 Q What way is that inaccurate?

13 A This is all inaccurate, because I sent

14 her -- I sent her -- her main thing was, If anybody

15 can get your job back, I'm going, verbatim, I'm

16 going to be that person -- well, she didn't even put

17 that in here. That's the thing. She didn't put

18 that in here at all. You know, I'm going to be the

19 person that can go and talk to who I need to talk

20 to.

21 If I -- her main thing that she wanted me

22 to produce was the license. It was the -- and, you

23 know, to prove the dual residency, which is what

24 Kiha and Mehret did not ask me for at all.

25 And so once I got that, I sent that. You

<p style="text-align: right;">Page 233</p> <p>1 know, she didn't -- it wasn't really a time limit on 2 that. It was just, If you can get that in there, 3 and I can just kind of look it over and see that he 4 is a dual resident, I'm going to the person that can 5 possibly talk to get you reinstated. That's kind of 6 how that conversation went.</p> <p>7 As far as like the graduation thing, I 8 told her I would try to see about getting that, as 9 far as, I guess, I don't know, a program or 10 something like that. But that's where I think I 11 faxed to you the letter from Jovan per him saying 12 like he's not giving out his minor child's school 13 information, blah, blah, blah, this, that and the 14 other, information.</p> <p>15 But I made sure that I did fax over that, 16 as well as I faxed the license. And I'm seeing that 17 said she didn't receive it. But I know that I did 18 send -- I did send that to her so --</p> <p>19 Q So you sent her a driver's license, did 20 you?</p> <p>21 A I sent her the driver's license, as well 22 as the letter. Because her -- and she was real 23 adamant on that part, because that was towards the 24 end of the conversation. If you can by some chance 25 at least -- you know, because her thing was she</p>	<p style="text-align: right;">Page 235</p> <p>1 her the license, yes, sir.</p> <p>2 Q All right. So you never sent her any 3 information that suggested that Mr. Dais was out 4 there for a graduation.</p> <p>5 A No, I didn't -- yeah. That was the point 6 of the letter, him saying like he wasn't going to 7 send that part but --</p> <p>8 Q Did you --</p> <p>9 A -- her main thing was she wanted -- she 10 said, Get me that license. I need to see that he is 11 a resident there.</p> <p>12 Q Anything else?</p> <p>13 A No. That was it. And I never talked back 14 to that lady again.</p> <p>15 Q All right. Is there anything that you 16 talked about with Ms. Shaw, other than what you've 17 already told me or that's reflected in Exhibit 21?</p> <p>18 A No. I never spoke to her ever again after 19 that.</p> <p>20 Q All right.</p> <p>21 A I didn't even hear back after I sent her 22 what I sent her, other than the letter that came 23 telling me that they up -- that she upheld it, 24 because she thought she didn't, I guess, get that. 25 But now I'm seeing I did send that to her.</p>
<p style="text-align: right;">Page 234</p> <p>1 recognized with Kiha that was the biggest thing 2 like -- because that was the thing that they didn't 3 know, that he had a minor child in California, which 4 is the coparenting thing. Like that's why -- that's 5 what we kind of zeroed in towards the end with me 6 and Kiha, I'm like, He goes -- because her main 7 thing was that's another reason why she was 8 suspending it, Ben, because she was like if he --</p> <p>9 Q You've got to stop.</p> <p>10 The question is, there's a simple 11 question, you sent to Ms. Shaw --</p> <p>12 A Yes, I did. I sent her the copy --</p> <p>13 Q Stop. You sent to her a driver's license.</p> <p>14 A Uh-huh, I did.</p> <p>15 Q And you sent to her a letter from Mr. Dais 16 that says, I'm not giving any information about my 17 minor child.</p> <p>18 A Yeah, about the school. It was -- because 19 she was asking for -- like wanting the -- like a 20 school address or whatever. And, of course, that 21 was a thing of him asking her mom. And the mother 22 is like, No, who's asking about my kid.</p> <p>23 Q I didn't ask you any of those questions. 24 I just asked you what you sent her.</p> <p>25 A Yeah. I sent her that letter, and I sent</p>	<p style="text-align: right;">Page 236</p> <p>1 Q Well, you sent her what you told me you 2 sent her; correct?</p> <p>3 A Yeah. I sent her what she asked for, but 4 she said I didn't send it.</p> <p>5 Q You didn't send her anything about the 6 graduation.</p> <p>7 A Yeah, but she didn't -- that was the 8 thing. Her main thing was she wanted -- she wanted 9 the license.</p> <p>10 Q That was your understanding?</p> <p>11 A That was my -- well, that was my 12 understanding. Because that's what I said, towards 13 the end of the conversation she was very adamant on, 14 You get me that, then I could do -- try to do some 15 talking for you. And then she ended it with, 16 Getting you reinstated. But I need to be able to 17 verify that he is a resident there.</p> <p>18 Q She asked you to provide documentation to 19 support the claim that he was there for the 20 daughter's graduation; correct?</p> <p>21 A Yeah, but that --</p> <p>22 Q And you didn't do that.</p> <p>23 A No, but that -- no, that -- that's what 24 I'm saying, that's not accurate. That's not -- that 25 part is not accurate. She wanted the license, Ben.</p>

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<p style="text-align: right;">Page 237</p> <p>1 I sent her what she asked for.</p> <p>2 Q Ms. Stevenson, you're kind of making this</p> <p>3 up as you go along. Because a moment ago I asked</p> <p>4 you if there was anything inaccurate in that</p> <p>5 statement, and you said no, it was all accurate.</p> <p>6 And now are you telling me it's</p> <p>7 inaccurate?</p> <p>8 A It is all accurate. But I'm saying that</p> <p>9 what her thing was, she asked for a license. I'm</p> <p>10 not making anything up, Ben. This is my life and my</p> <p>11 career being toyed with. So I'm not playing any</p> <p>12 games with my life and my career. This has been</p> <p>13 really rough for me. And I was very, very clear</p> <p>14 on -- she was adamant on -- her main thing was if</p> <p>15 she got the license. In this it's stating that she</p> <p>16 received nothing from me, when I did send her</p> <p>17 something.</p> <p>18 Q Ms. Stevenson, who got -- after you were</p> <p>19 terminated, who was hired to replace you; do you</p> <p>20 know?</p> <p>21 A Who was hired to replace me?</p> <p>22 Q Yeah. Who took your job over?</p> <p>23 A What do you mean?</p> <p>24 Q After you were fired from Delta.</p> <p>25 A I wasn't there, so how would I know that?</p>	<p style="text-align: right;">Page 239</p> <p>1 (Exhibit 23 was marked for</p> <p>2 identification.)</p> <p>3 BY MR. STONE:</p> <p>4 Q And let me show you -- all right. Let me</p> <p>5 show you what's been marked as Exhibit No. 23.</p> <p>6 A Uh-huh.</p> <p>7 Q And ask if this is the right to sue letter</p> <p>8 that you received from the EEOC?</p> <p>9 A Is this the one -- is this the -- oh,</p> <p>10 okay. The right to -- yes, I think I -- yeah.</p> <p>11 Q And you understood this was a -- what's</p> <p>12 called a no cause determination. That the EEOC</p> <p>13 found no reason to believe anything unlawful that</p> <p>14 happened?</p> <p>15 A No. I mean that's not the way that -- you</p> <p>16 know, as far as like Mr. Pernice -- like that's not</p> <p>17 the way it was explained to me, I guess, in you</p> <p>18 all's terms, law. I just --</p> <p>19 Q Explained to you by who?</p> <p>20 A Like just when I've just asked people.</p> <p>21 Like I have a girlfriend that's an attorney. And my</p> <p>22 person that doesn't say it like that. I mean --</p> <p>23 Q You understand that they checked the box</p> <p>24 that said, The EEOC is unable to conclude that the</p> <p>25 information obtained establishes a violation of the</p>
<p style="text-align: right;">Page 238</p> <p>1 Q All right. So you don't know anything</p> <p>2 about that person.</p> <p>3 A What? I -- I don't --</p> <p>4 Q Okay.</p> <p>5 A Delta hire people all the time, don't</p> <p>6 they? They never -- I don't think they tell you who</p> <p>7 they're going to hire next. I've never heard of</p> <p>8 that before.</p> <p>9 Q All right. Let me show you --</p> <p>10 A That's new to me. I didn't know they</p> <p>11 hired somebody.</p> <p>12 (Exhibit 22 was marked for</p> <p>13 identification.)</p> <p>14 BY MR. STONE:</p> <p>15 Q All right. Let me show you what's been</p> <p>16 marked as Exhibit 22.</p> <p>17 A Uh-huh.</p> <p>18 Q And just ask you if this is the charge you</p> <p>19 filed with the EEOC?</p> <p>20 A Uh-huh. Yes.</p> <p>21 Q All right. That's your signature at the</p> <p>22 bottom?</p> <p>23 A That is my signature.</p> <p>24 Q All right.</p> <p>25</p>	<p style="text-align: right;">Page 240</p> <p>1 statutes.</p> <p>2 A But they gave me -- what's that, the right</p> <p>3 to sue? The right to sue.</p> <p>4 Q You understand everybody gets that no</p> <p>5 matter what.</p> <p>6 A I'm not an attorney, so I mean --</p> <p>7 Q All right.</p> <p>8 A And I didn't ask my attorney friend.</p> <p>9 Q You were terminated from Delta in July of</p> <p>10 2015; correct?</p> <p>11 A July 28th.</p> <p>12 Q All right. And when did you start looking</p> <p>13 for new work after that date? How long did you</p> <p>14 wait?</p> <p>15 A I'm going to be honest, I don't know, Ben.</p> <p>16 My life was turned upside down. I lost everything.</p> <p>17 I have no clue -- I can't -- I can only go --</p> <p>18 nobody -- I wasn't -- again, I was almost ten years</p> <p>19 in, and I was loving my career. I have no -- I</p> <p>20 really don't know. My mind was -- I don't remember</p> <p>21 the day, if it was a week later, it was a -- I don't</p> <p>22 know. I just -- nothing was clear for me.</p> <p>23 Q When did you get a new job?</p> <p>24 A Right after that?</p> <p>25 Q Yeah. When was the next time you worked?</p>

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1 A I'm going to be honest, I probably -- I
2 didn't. I was -- I was in pain. I was going
3 through -- I was going through a lot, so I --
4 mental, physical, homelessness, living in my car.
5 I -- I don't know. I --
6 Q Have you gotten any job since you left
7 Delta?
8 A I have no idea or clue.
9 Huh?
10 Q Have you gotten any job since you left
11 Delta?
12 A Yes.
13 Q What job -- what's the first job you got
14 after you left Delta?
15 A I do work now -- well, I mean I worked --
16 I worked as a nanny and, you know, took -- helped to
17 take care of -- you know, a doctor, I helped to take
18 care of her kids, her autistic child.
19 Q When was that?
20 A That was probably -- I started -- I did
21 that like -- I think I started that -- I did that
22 May of last year, from -- from May until about March
23 of this year. I occasionally still help her take
24 care of her kids, because she is a doctor, and she
25 don't have -- she always in surgery so --

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1 Q What's her name?
2 A Dr. Melinda Miller-Thrasher.
3 Q Is that the same Melinda Miller-Thrasher
4 who's your OB/GYN?
5 A Yes. Well, she's -- she's my doctor, when
6 I go to her, but I have other doctors too, yeah.
7 Q So you are a nanny for your OB/GYN.
8 A Yes. I have -- I have been.
9 Q All right. And was that a full-time job
10 from May of 2016 to March of 2017?
11 A It was just kind of -- you know, she knew
12 I was down on my luck, and she just kind of -- she
13 knew I was homeless and stuff. She just kind of
14 helped me out. You know, it was like as -- like as
15 she needed me. It became regularly, like every --
16 she used me like every -- every weekend. Sometimes
17 it would be four days. Sometimes it would be for
18 the whole week.
19 Q How much did she pay you?
20 A I would -- that varied, because sometimes
21 I would get paid like 350. Sometimes it was 250.
22 No more than 350 for the week.
23 Q Did she pay you cash, or did she write you
24 a check?
25 A She did both. She did a little bit of

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1 both. Sometimes she would give me cash. Sometimes
2 she would just write a check out to me.
3 Q Do you have a bank account?
4 A I do.
5 Q Where is your bank account?
6 A Regions, and I have a Wells Fargo.
7 Q Okay. Which account do you use as your
8 regular checking account?
9 A I use Regions more.
10 Q But you use both actively?
11 A Yeah. I can use both. It's just --
12 Q So when Dr. Thrasher would write you a
13 check, where would you deposit it?
14 A Actually, what I would do is -- like she
15 has a Wells Fargo. So if she like wrote me a check,
16 I would sometimes -- just sometimes cash it because
17 it was -- they'd charge me the \$7, and they'd give
18 me the money.
19 Q So we now know that you were working as a
20 nanny from May of 2016 forward and still do
21 occasionally now.
22 A Yeah, I still help her out.
23 Q Between July of 2015 and May of 2016, when
24 you started as a nanny, did you work any job?
25 A No, I -- I helped out -- I went and did my

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1 community service. I did polling. I worked -- they
2 paid me to work the vote -- I worked the polls.
3 Q Anything else?
4 A They pay you -- they pay you 250, yeah,
5 250. That's it, just the voting. I -- there was --
6 yeah, just the nanny stuff. That kind of helped me
7 out a little.
8 Q Did you apply for any jobs?
9 A I was applying. I applied -- I applied at
10 Southwest. I applied at American. I did get an
11 e-mail back -- very competitive for the in flight,
12 which is where I've always wanted to be. It was --
13 they -- I heard back from American.
14 I applied at United. They told me they
15 still was looking at me, but they had a furlough or
16 something, and they had so many people just waiting.
17 So I just got to just wait to get a call. Still
18 haven't gotten a call.
19 I was going to try to substitute teach
20 since I have a biology degree. I mean I inquired at
21 Cobb County, but I didn't -- I mean I didn't --
22 Q You didn't formally apply?
23 A Yeah, I didn't -- I worked for them
24 before, and I didn't -- I just didn't go back by the
25 office thing. Because, like I said, I was just



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<p style="text-align: right;">Page 245</p> <p>1 going through a lot. I didn't go back by and go</p> <p>2 back through the little certification for that.</p> <p>3 Q Other than Southwest, American and United,</p> <p>4 did you apply for any other jobs?</p> <p>5 A I applied at a restaurant, actually right</p> <p>6 up the street here, to be a waitress. What -- oh,</p> <p>7 my gosh, it's a -- Cocina, La Cocina, just to be a</p> <p>8 waitress because I know they make money every day</p> <p>9 when they waitress. La Cocina. Sorry, this is</p> <p>10 really emotionally difficult for me because I had a</p> <p>11 career. La Cocina. What else? What else? I think</p> <p>12 I -- I think I was just -- I was doing like</p> <p>13 waitressing. Trying to get back on with the airline</p> <p>14 industry. That was pretty much it and --</p> <p>15 Q Anyplace else that you applied that you</p> <p>16 can tell me?</p> <p>17 A Gosh, did I apply at the -- no, I didn't</p> <p>18 apply at the post office yet. Somebody gave me</p> <p>19 information, but I don't think I ever did that. I</p> <p>20 know I applied a couple of other places, Ben, but I</p> <p>21 honestly do not remember.</p> <p>22 I do know that by being the nanny, when</p> <p>23 you take the kids to places where other nannies be</p> <p>24 at, you get to talking. And I was being referred,</p> <p>25 like, Oh, I think you would be good taking care of</p>	<p style="text-align: right;">Page 247</p> <p>1 an e-mail. And I'm working there now, just -- yeah.</p> <p>2 He sent me an e-mail back. He sent me an e-mail</p> <p>3 back. There's a little happiness there. He sent me</p> <p>4 an e-mail back. And then he said, We are -- we</p> <p>5 presently opened it back up. We're now hiring,</p> <p>6 Quaniah. Are you still interested?</p> <p>7 I said, Absolutely, and then so on and so</p> <p>8 on.</p> <p>9 Q So what are you doing for them?</p> <p>10 A Security officer.</p> <p>11 Q Where?</p> <p>12 A Like Camp Creek Airport.</p> <p>13 Q How many days a week?</p> <p>14 A Four -- four days on, three days off.</p> <p>15 That's the way they had it scheduled. Some people</p> <p>16 are three days on. Some people are four days on. I</p> <p>17 need to work as much as possible so I'm four days,</p> <p>18 and three days off.</p> <p>19 Q And what are you earning?</p> <p>20 A How much is it? Oh, \$10.</p> <p>21 Q \$10 an hour?</p> <p>22 A Uh-huh.</p> <p>23 Q All right. And how many hours a week?</p> <p>24 A 32.</p> <p>25 Q Okay. All right. Any other job that</p>
<p style="text-align: right;">Page 246</p> <p>1 their kids or whatever. So people was referring me.</p> <p>2 Like, Hey, I got to take off -- they go out of the</p> <p>3 country for a month. And I'll probably see if they</p> <p>4 can hire you, Quaniah, to take care of kids for two</p> <p>5 months, that little stuff. So other nannies was</p> <p>6 referring me to help them out with their kids so --</p> <p>7 Q Okay. Any other job applications?</p> <p>8 A Not that I can think of right now.</p> <p>9 Q Anyplace else that you've worked, other</p> <p>10 than the polling place and as a nanny for that --</p> <p>11 A Oh, you know what, duh, light bulb, DGS.</p> <p>12 Q Uh-huh.</p> <p>13 A I'm sorry. I guess that's how much I got</p> <p>14 on my mind.</p> <p>15 Q Okay. When did you apply to DGS?</p> <p>16 A I'll be honest, I don't remember</p> <p>17 accurately when I applied. I just know I was</p> <p>18 referred by another girl that worked there that gave</p> <p>19 me the information. I applied -- I reached out to</p> <p>20 the person -- I applied. And then at the time that</p> <p>21 I initially applied, which probably was almost a</p> <p>22 year ago, the supervisor e-mailed me back and said,</p> <p>23 We're not hiring at this time. When we open back</p> <p>24 up, we will let you know.</p> <p>25 And then they opened it back up. Sent me</p>	<p style="text-align: right;">Page 248</p> <p>1 you've held, other than the three jobs that you've</p> <p>2 identified, since you lost your employment at Delta?</p> <p>3 A No, sir, no, not just -- no, just the</p> <p>4 nanny stuff and working the voting stuff.</p> <p>5 Q Is there any period of time since you left</p> <p>6 Delta that you've been unable to work for any</p> <p>7 reason?</p> <p>8 A No, no, just --</p> <p>9 Q All right. You told me a moment or a</p> <p>10 little bit ago about Mr. Pernice and his -- and the</p> <p>11 advice.</p> <p>12 Have you hired any other lawyer to</p> <p>13 represent you in this matter?</p> <p>14 A Not at this present time. I do have one</p> <p>15 that, actually, I -- well, the -- what do you call</p> <p>16 it, secretary assistant had called me back. I</p> <p>17 actually was supposed to talk to that person. Was</p> <p>18 it Thursday of last week for today. My phone got</p> <p>19 disconnected. I had no contact for like three days,</p> <p>20 and I missed out on that. So right now I don't know</p> <p>21 if I'm -- I don't -- not right this second.</p> <p>22 Q All right.</p> <p>23 MR. STONE: We are -- at this time, I'm</p> <p>24 going to suspend, but not end the deposition,</p> <p>25 Ms. Stevenson. And the reason is is because,</p>

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<p style="text-align: right;">Page 249</p> <p>1 candidly, you have a lot of documents that you</p> <p>2 had an obligation to provide for months that</p> <p>3 you haven't provided, including all the</p> <p>4 documents in the storage area.</p> <p>5 THE WITNESS: I think most of those are --</p> <p>6 honestly, Ben, there may be a couple, but I</p> <p>7 think most of them might be a lot -- may just</p> <p>8 be duplicates.</p> <p>9 MR. STONE: But you don't know that,</p> <p>10 Ms. Stevenson --</p> <p>11 THE WITNESS: Oh, okay.</p> <p>12 MR. STONE: -- because you haven't looked</p> <p>13 for them.</p> <p>14 THE WITNESS: Okay.</p> <p>15 MR. STONE: And so we're going to reserve</p> <p>16 the right to reconvene this deposition at some</p> <p>17 point in the future after you've done what the</p> <p>18 court has repeatedly ordered you to do.</p> <p>19 THE WITNESS: And, again, like I say, you</p> <p>20 would have had. It's just I -- until my father</p> <p>21 just, you know, helped me out with that, I</p> <p>22 have -- I've been locked out and had no way to</p> <p>23 go in there and look in other book bags and</p> <p>24 see.</p> <p>25 But I really think most of the stuff is</p>	<p style="text-align: right;">Page 251</p> <p>1 just taken your deposition, or at least part of</p> <p>2 your deposition here.</p> <p>3 The way this works, of course, is that the</p> <p>4 court reporter has been here and has been</p> <p>5 taking down my questions to you and your</p> <p>6 answers.</p> <p>7 THE WITNESS: Yes, sir.</p> <p>8 MR. STONE: In a matter of a couple or</p> <p>9 three weeks probably she will have prepared a</p> <p>10 transcript that is a -- looks like a booklet of</p> <p>11 everything that was on the record asked and</p> <p>12 answered.</p> <p>13 THE WITNESS: Even the uh-huhs.</p> <p>14 MR. STONE: Even the uh-huhs. Correct.</p> <p>15 THE WITNESS: Got you.</p> <p>16 MR. STONE: You have a right, if you so</p> <p>17 choose, to what's called reserve reading and</p> <p>18 signing. That is before the deposition is made</p> <p>19 final, to read it over and see if there's any</p> <p>20 mistakes that are made in the deposition</p> <p>21 transcript, for example.</p> <p>22 You don't have to do that, but you have a</p> <p>23 right to do that. And so the question is, do</p> <p>24 you want to reserve that right, or do you want</p> <p>25 to waive that right?</p>
<p style="text-align: right;">Page 250</p> <p>1 more than likely probably duplicate. Like it</p> <p>2 probably is a duplicate of this, duplicate --</p> <p>3 it may be -- I really don't think it's</p> <p>4 anything. So I really honestly think at this</p> <p>5 point I've given you everything.</p> <p>6 MR. STONE: Well, Ms. Stevenson, I don't</p> <p>7 have any idea what's in there because you</p> <p>8 haven't looked yet.</p> <p>9 So we'll reserve, after you've done what</p> <p>10 you're required to do, which is to get us</p> <p>11 additional tax returns and the additional</p> <p>12 documents that are subject to production.</p> <p>13 THE WITNESS: The '12? Because did you</p> <p>14 get my fax with the others I sent?</p> <p>15 MR. STONE: I've gotten some, but I have</p> <p>16 not gotten 2012.</p> <p>17 THE WITNESS: No, I'll get that.</p> <p>18 MR. STONE: So and then we'll reserve the</p> <p>19 right to continue this deposition and to ask</p> <p>20 further questions at the appropriate time, if</p> <p>21 we so choose. But subject to that, I have no</p> <p>22 further questions at this time. I appreciate</p> <p>23 it.</p> <p>24 (Discussion off the record.)</p> <p>25 MR. STONE: Ms. Stevenson, you -- we've</p>	<p style="text-align: right;">Page 252</p> <p>1 THE WITNESS: Reserving it --</p> <p>2 MR. STONE: Reserving it --</p> <p>3 THE WITNESS: -- means I can make</p> <p>4 corrections if I want to?</p> <p>5 MR. STONE: -- means you'll get it and</p> <p>6 you'll -- yes.</p> <p>7 THE WITNESS: Yeah, I'll reserve the</p> <p>8 right, if I need to.</p> <p>9 MR. STONE: That will be fine. And the</p> <p>10 court reporter will -- you'll need to arrange a</p> <p>11 way for the court reporter to get you a copy of</p> <p>12 the deposition.</p> <p>13 (Discussion off the record.)</p> <p>14 THE REPORTER: Paper, electronic or both?</p> <p>15 MR. STONE: I want an E-file, whatever you</p> <p>16 all call them, and a Minuscript, please.</p> <p>17 (Pursuant to Rule 30(e) of the Federal</p> <p>18 Rules of Civil Procedure and/or O.C.G.A.</p> <p>19 9-11-30(e) signature of the witness has been</p> <p>20 reserved.)</p> <p>21 (Deposition was concluded at 2:50 p.m.)</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 COURT REPORTER CERTIFICATE</p> <p>2</p> <p>3 STATE OF GEORGIA:</p> <p>4</p> <p>5</p> <p>6 I hereby certify that the foregoing</p> <p>7 transcript was reported, as stated in the caption,</p> <p>8 and the questions and answers thereto were reduced</p> <p>9 to typewriting under my direction; that the</p> <p>10 foregoing pages represent a true, complete and</p> <p>11 correct transcript of the evidence given upon said</p> <p>12 deposition, and I further certify that I am not of</p> <p>13 kin or counsel to the parties in the case; am not in</p> <p>14 the employ of counsel for any of said parties; nor</p> <p>15 am I in any way interested in the result of said</p> <p>16 case.</p> <p>17</p> <p>18 </p> <p>19 Mari B. Temple, RPR, CMRS</p> <p>20 Certified Court Reporter</p> <p>21 Certificate Number 2844</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 CASE: Quaniah R. Stevenson vs Delta Air Lines, Inc.</p> <p>2 NAME OF WITNESS: Quaniah Renetra Stevenson</p> <p>3 The preceding deposition was taken</p> <p>4 in the matter, on the date and at the time and</p> <p>5 place set out on the title page hereof.</p> <p>6</p> <p>7 It was requested that the deposition</p> <p>8 be taken by the reporter and that same be</p> <p>9 reduced to typewritten form.</p> <p>10</p> <p>11 It was agreed by and between counsel</p> <p>12 and the parties that the deponent will read and</p> <p>13 sign the transcript of said deposition.</p> <p>14</p> <p>15 Said jurat is to be returned within</p> <p>16 30 days following receipt of the transcript to</p> <p>17 the following address:</p> <p>18</p> <p>19 Elizabeth Gallo Court Reporting, LLC</p> <p>20 2900 Chamblee Tucker Road</p> <p>21 Building 13, First Floor</p> <p>22 Atlanta, Georgia 30341</p> <p>23</p> <p>24</p> <p>25</p>
<p>1 DISCLOSURE OF NO CONTRACT</p> <p>2</p> <p>3 I, Mari B. Temple, RPR, Certified Court</p> <p>4 Reporter, do hereby disclose, pursuant to Article</p> <p>5 10.B. of the Rules and Regulations of the Board of</p> <p>6 Court Reporting of the Judicial Council of Georgia,</p> <p>7 that I am a Georgia Certified Court Reporter; I was</p> <p>8 contacted by the party taking the deposition to</p> <p>9 provide court reporting services for this</p> <p>10 deposition; I will not be taking this deposition</p> <p>11 under any contract that is prohibited by O.C.G.A.</p> <p>12 15-14-37(a) and (b) or Article 7.C. of the Rules and</p> <p>13 Regulations of the Board; and I am not disqualified</p> <p>14 for a relationship of interest under O.C.G.A.</p> <p>15 9-11-28(c).</p> <p>16</p> <p>17 There is no contract to provide services</p> <p>18 between myself or any person with whom I have a</p> <p>19 principal and agency relationship, nor any attorney</p> <p>20 at law in this action, party to this action, party</p> <p>21 having a financial interest in this action, or agent</p> <p>22 for an attorney at law in this action, party to this</p> <p>23 action, or party having a financial interest in this</p> <p>24 action. Any and all financial arrangements beyond</p> <p>25 my usual and customary rates have been disclosed and</p> <p>offered to all parties.</p> <p>This 6th day of July, 2017.</p> <p>17</p> <p>18 </p> <p>19</p> <p>20 Mari B. Temple, RPR, CMRS</p> <p>21 Certified Court Reporter</p> <p>22 Certificate Number 2844</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 NAME OF CASE: Quaniah R. Stevenson vs Delta Air Lines, Inc.</p> <p>2 DATE OF DEPOSITION: 06/29/2017</p> <p>3 NAME OF WITNESS: Quaniah Renetra Stevenson</p> <p>4 EGCR Job No.: 39485</p> <p>5 CERTIFICATE</p> <p>6 Before me this day personally</p> <p>7 appeared QUANIAH RENETRA STEVENSON, who, being duly</p> <p>8 sworn, states that the foregoing transcript of</p> <p>9 his/her deposition, taken in the matter, on</p> <p>10 the date and at the time and place set out on</p> <p>11 the title page hereof, constitutes a true and</p> <p>12 accurate transcript of said deposition.</p> <p>13</p> <p>14 QUANIAH RENETRA STEVENSON</p> <p>15 SUBSCRIBED and SWORN to before me</p> <p>16 this _____ day of _____ 20____.</p> <p>17 in the jurisdiction aforesaid.</p> <p>18</p> <p>19 My Commission Expires _____ Notary Public</p> <p>20 STATE OF _____</p> <p>21 COUNTY/CITY OF _____</p> <p>22</p> <p>23 [] No changes made to the Errata Sheet;</p> <p>24 therefore, I am returning only this signed,</p> <p>25 notarized certificate.</p> <p>[] I am returning this signed,</p> <p>notarized certificate and Errata Sheet with</p> <p>changes noted.</p>

<p>Page 257</p> <p>1 Errata Sheet</p> <p>2 NAME OF CASE: Quaniah R. Stevenson vs Delta Air Lines, Inc.</p> <p>3 DATE OF DEPOSITION: 06/29/2017</p> <p>4 NAME OF WITNESS: Quaniah Renetra Stevenson</p> <p>5 Reason Codes: 1. To clarify the record</p> <p>6 2. To correct transcription errors</p> <p>7 3. Other</p> <p>8 _____</p> <p>9 Page ____ Line ____ Reason ____</p> <p>10 From _____ to _____</p> <p>11 Page ____ Line ____ Reason ____</p> <p>12 From _____ to _____</p> <p>13 Page ____ Line ____ Reason ____</p> <p>14 From _____ to _____</p> <p>15 Page ____ Line ____ Reason ____</p> <p>16 From _____ to _____</p> <p>17 Page ____ Line ____ Reason ____</p> <p>18 From _____ to _____</p> <p>19 Page ____ Line ____ Reason ____</p> <p>20 From _____ to _____</p> <p>21 Page ____ Line ____ Reason ____</p> <p>22 From _____ to _____</p> <p>23</p> <p>24 SIGNATURE: _____ DATE: _____</p> <p>25 Quaniah Renetra Stevenson</p>	
<p>Page 258</p> <p>1 Errata Sheet</p> <p>2 NAME OF CASE: Quaniah R. Stevenson vs Delta Air Lines, Inc.</p> <p>3 DATE OF DEPOSITION: 06/29/2017</p> <p>4 NAME OF WITNESS: Quaniah Renetra Stevenson</p> <p>5 Reason Codes: 1. To clarify the record</p> <p>6 2. To correct transcription errors</p> <p>7 3. Other</p> <p>8 _____</p> <p>9 Page ____ Line ____ Reason ____</p> <p>10 From _____ to _____</p> <p>11 Page ____ Line ____ Reason ____</p> <p>12 From _____ to _____</p> <p>13 Page ____ Line ____ Reason ____</p> <p>14 From _____ to _____</p> <p>15 Page ____ Line ____ Reason ____</p> <p>16 From _____ to _____</p> <p>17 Page ____ Line ____ Reason ____</p> <p>18 From _____ to _____</p> <p>19 Page ____ Line ____ Reason ____</p> <p>20 From _____ to _____</p> <p>21 Page ____ Line ____ Reason ____</p> <p>22 From _____ to _____</p> <p>23</p> <p>24 SIGNATURE: _____ DATE: _____</p> <p>25 Quaniah Renetra Stevenson</p>	

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